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Presidio Trust Management Plan  
Main Post Update

## Record of Decision

THE PRESIDIO TRUST  
February 23, 2011



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## TABLE OF CONTENTS

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1	Background	1
2	Need for Main Post Update	5
3	Alternatives Considered in Final SEIS	7
4	Selected Alternative and Basis for Decision	9
5	Reasons for Rejection of Other Alternatives	12
6	Identification of Environmentally Preferable Alternative	13
7	Measures to Lessen or Avoid Potentially Significant Environmental Impacts	16
8	Public Involvement	16
9	Agency Consultation	17
10	Implementation of Main Post Update	18
11	Comments on Final SEIS	18
12	Conclusion	20

### Figure

1	Selected Alternative (Alternative 2: Main Post Update)	9
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### Tables

1	Alternatives Including the Mitigated Preferred Alternative	7
2	Relationship of Alternatives to NEPA Goals	14
3	Public Agencies, Organizations, and Individuals Commenting on the PTMP Main Post Update Final SEIS	19

### Attachments

A	PTMP Main Post Update Mitigation Monitoring and Enforcement Program	A-1
B	Response to Comments on Final SEIS	B-1
C	Errata	C-1

# Record of Decision

The Presidio Trust (Trust) is proposing to implement its vision for the Main Post as the “heart of the Presidio,” to update the planning concept for the Main Post district as described in the PTMP, and to add greater detail to the planning for the Main Post than was possible when the PTMP was completed in 2002. The Trust is making this decision in accordance with the Presidio Trust Act (Trust Act), as amended (16 USC 460bb appendix), and as guided by the Presidio Trust Management Plan<sup>1</sup> (PTMP). The updated planning concept for the Main Post is the mitigated preferred alternative (Alternative 2) evaluated in the final supplemental environmental impact statement (SEIS) for the Main Post Update. The Trust has prepared this record of decision (ROD) for the final SEIS. The final SEIS is a supplement to and tiers from the final EIS for the PTMP. The Trust developed the ROD in compliance with agency decision-making requirements under the National Environmental Policy Act of 1969 (NEPA) as amended (42 USC 4321 et seq.), NEPA’s implementing regulations promulgated by the Council on Environmental Quality (CEQ) (40 CFR 1500 et seq.), and the Trust’s policies and procedures on environmental quality and control (36 CFR 1010).

The ROD documents the decision and rationale for selecting the mitigated preferred alternative for the Main Post district. The ROD is a statement of the decision, alternatives considered, the nature of public involvement and agency consultation, and mitigating measures developed to avoid or minimize environmental impacts. Based upon public comments received on the June 2008 draft SEIS and the February 2009 supplement to the draft SEIS for the Main Post Update, the Trust made appropriate changes to the proposed projects and improvements as reflected in revised analyses and on November 26, 2010 released the final SEIS. The Trust’s responses to the comments on the draft SEIS and supplement can be found in the Response to Comments volume of the final SEIS.

## 1 BACKGROUND

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The Trust is the federal agency responsible for the 1,168-acre inland area of the Presidio of San Francisco (Presidio) known as Area B. The Presidio is part of the nation’s largest and most visited urban national park<sup>2</sup> and the largest active historic preservation project in the country.

The “Defender of the Gate” from 1776 until 1994, the Presidio was a military garrison for almost 220 years. In 1776, the Spanish founded El Presidio de San Francisco to prevent Russia and Britain from establishing a presence on the San Francisco Bay. From 1822 to 1835, the Presidio became the northernmost outpost of an independent Mexico, and in 1846, during the Mexican-American War, the

<sup>1</sup> *The PTMP is the Trust’s comprehensive land use plan, policy framework, and established management direction for Area B of the Presidio.*

<sup>2</sup> *An estimated 20 million people visit the Golden Gate National Recreation Area each year.*

U. S. Army took control of the Presidio. Over time, the U.S. Army fortified, developed, and landscaped the Presidio as one of the nation's premier military posts and the center of command in the west.

The Presidio is a showcase of military architecture dating from the 1860s through the Cold War era. It also contains the archaeological remains of the original El Presidio, the primary resource identified when the Presidio was designated a National Historic Landmark District (NHLD) in 1962. The Presidio contains over 800 buildings, of which 469 are historic and contribute to its status as a NHLD. In addition, the Presidio contains significant cultural landscapes, including a 300-acre historic forest, designed landscape areas, and formal open spaces such as the three parade grounds at the center of the Main Post. These historic elements are complemented by important natural features, spectacular vistas, and recreational opportunities.

In 1994, the U.S. Army departed and the Presidio became a part of the Golden Gate National Recreation Area. Following the passage of the Trust Act in 1996, Area B, the major part of the Presidio, came under the jurisdiction of the newly created Presidio Trust.<sup>3</sup> The Trust is a federal agency established by Congress and overseen by a board of directors appointed by the President. The Trust's mission is to preserve and enhance the Presidio as an enduring resource for all Americans. Annual federal appropriations to the Trust diminish each year and will cease at the end of fiscal year 2012. The Trust was given the necessary flexibility to redevelop and operate the Presidio as a financially self-sustaining national park. Lease revenues from building reuse will support the long-term operation and maintenance of the park. No other part of a national park is managed in this way.

In 2002, the Trust adopted the PTMP, which lays out a framework for how the Trust will manage Area B. The PTMP sets forth planning concepts and guidelines for each of the Presidio's seven planning districts, including the Main Post.<sup>4</sup> The PTMP envisions the Main Post as the heart of the Presidio and calls for preserving and rehabilitating the Main Post's historic buildings, while allowing some new construction. The planning guidelines for the Main Post presented in the PTMP address overall spatial organization and land patterns, buildings and structures, open space, vegetation, views, and circulation and access.

The plans for the Main Post have generated considerable public interest and multiple proposals for new uses. The Trust approached each of these as it has other new projects, preparing NEPA documents on the specific proposals, all tiered from the final PTMP EIS. Certain of those proposals moved through the NEPA process to conclusion, including the Walt Disney Family Museum, the International Center to End Violence, and the Main Parade rehabilitation. In each case an environmental assessment (EA) was prepared, followed by a finding of no significant impact (FONSI). In each of the aforementioned projects, the Trust also found that those proposals were consistent with the PTMP, were independently justified, did not have significant environmental impacts, and would not prejudice other decisions about the Main Post.

The Trust then initially proceeded to treat two other proposals for the Main Post in a similar fashion, one for lodging and the other for cultural activities. On November 10, 2006, the Trust initiated public scoping

<sup>3</sup> *The 323 coastal acres, Area A, are managed by the National Park Service.*

<sup>4</sup> *The seven planning districts are Main Post, Crissy Field (Area B), Letterman, Fort Scott, Public Health Service, East Housing, and South Hills.*

for a Presidio Lodge to be located in the Main Post, commencing an EA process and noting that the PTMP projected the Main Post as a preferred location for a “limited amount of lodging.” Four alternative sites suitable for the development of the lodge were offered for consideration. In response to the Trust’s Request for Expressions of Interest, more than a dozen responses were received. After public workshops and a Request for Proposals (RFP) issued by the Trust, several teams were invited to submit proposals, of which one (Larkspur Hotels & Restaurants) was then selected by the Trust as its development partner. The Trust customarily uses an RFP to generate proposals and select a development partner (without selecting a site or design) so that it has one or more concrete, buildable alternatives to analyze in its NEPA process.<sup>5</sup>

In August 2007, the Trust gave public notice that it was going to prepare an EIS for a proposed museum at the Main Post. This was followed by an RFP process (similar to that described for the Presidio Lodge) that identified three sites on the Main Post, two involving reuse of structures (Buildings 103 and 105) along the Montgomery Street Barracks and the third involving new construction to the south of the Main Parade. The RFP followed an offer from Gap, Inc. founders Doris and Donald Fisher to build a new museum of contemporary art (CAMP) to display their collection of contemporary art for the enjoyment of the public. Thereafter the RFP was amended to add one more alternative, Building 101, another of the Montgomery Street Barracks, as part of the proposed museum’s program facilities. In response to the RFP, proposals by the CAMP and by the Presidio Historical Association were submitted for a contemporary art museum and for a History Center, respectively. The Trust then proceeded to hold a scoping meeting and to receive comments on the then-proposed museum EIS.

After careful consideration of public comments, the Trust terminated the NEPA processes for both the lodge and the art museum. Instead, the Trust prepared a more comprehensive draft document that would supplement the final PTMP EIS and assess the cumulative impacts on the environment of all reasonably foreseeable Trust actions at the Main Post, including site-specific analysis for both the lodge and the contemporary art museum. A scoping meeting was held and scoping comments were received and used in preparing the draft SEIS. The updated planning concept for the Main Post was evaluated as the proposed action (Alternative 2) in the draft SEIS that was circulated on June 13, 2008.

At the same time, the Trust provided for the review of the proposals under other federal environmental laws. Chief among these was the consultation process required by Section 106 of the National Historic Preservation Act of 1966 (NHPA) as amended (16 U.S.C. 470 et seq.). This process identified the historic

<sup>5</sup> *When the creation of a project is dependent upon the volition and the resources of a private party, the Trust must have a realistic assurance that among all the reasonable alternatives that it analyzes is one or more alternatives that a viable development party proposes to undertake. It makes little sense to focus on alternatives (however theoretically attractive) that nobody proposes to build. As the CEQ has stated in public guidance, “There is... no need to disregard the applicant’s purposes and needs and the common sense realities of a given situation in the development of alternatives” (CEQ Guidance Regarding NEPA Regulations, 48 FR 34263-34267 [July 28, 1983]; also see 36 CFR 1010.3 [Trust’s definition of “project applicant”]). As CEQ put it, “NEPA has never been interpreted to require examination of purely conjectural possibilities whose implementation is deemed remote and speculative. Rather, the agency’s duty is to consider ‘alternatives as they are likely to exist’” (CEQ Guidance Regarding NEPA Regulations, 48 FR 34263-34267 [July 28, 1983]).*

resources that may be affected by the undertaking, assessed the effects on historic resources through a Finding of Effect (FOE), and then described ways to “avoid, minimize, or mitigate” the effects identified in the FOE. The draft FOE was circulated for comment on August 8, 2008.

Following the release of the draft SEIS and the draft FOE, the Trust worked with the National Park Service, the California State Historic Preservation Officer, the Advisory Council on Historic Preservation, and other parties to develop approaches that would avoid, minimize, or mitigate identified adverse effects of the various proposals on the NHLD. These approaches included ways to reduce building size, scale, and mass; ways to orient the buildings to the site; and ways to articulate the buildings with architectural features. The Trust shared the results of this work with the consulting parties to the Section 106 process<sup>6</sup> and the proponents’ respective design teams, and also held a public workshop and accepted public comment on these conforming strategies. Additionally, the Trust conducted a series of three workshops with the public that focused on the development of a preferred alternative and transportation issues.

Through this public process, the Trust identified a preferred alternative that emerged from its analysis of the proposals, and that considered public comment on the draft SEIS and consultation to date under the Section 106 process. The Trust elected to address the preferred alternative in a supplement to the draft SEIS to best integrate and satisfy its NEPA and NHPA obligations. The supplement identified and discussed the environmental impacts of a preferred alternative that combined elements of alternatives previously analyzed in the draft SEIS. The supplement to the draft SEIS was circulated for comment on March 6, 2009, along with a revised Main Post Update and a revised draft FOE.<sup>7</sup> Three public meetings, including one before the Trust Board of Directors, were held on the draft documents.

In July 2009, the proponents for the CAMP withdrew their effort to build the contemporary art museum at the Main Post. Following the proponents’ decision, the Trust developed the mitigated preferred alternative, which did not include the contemporary art museum, and which contemplated other changes in response to public comment and Section 106 consultation. These changes included modifying the proposals for the Presidio Theatre and Presidio Chapel to better preserve the buildings’ historic character; reducing the amount of new construction for the Presidio Lodge to reflect the scale and footprint of barracks previously located on the site; and reducing the overall amount of square footage at the Main Post, resulting in less development (maximum building area) than was provided for in the PTMP. These changes avoided or minimized adverse effects on the NHLD as well as responded to most of the concerns raised by members of the public during review of the supplement. Further the development of the mitigated preferred alternative fulfilled the Trust’s obligation under Section 110(f) of the NHPA “to the maximum extent possible to undertake such planning and actions as may be necessary to minimize harm to the landmark.” The Trust then assessed comments received on the supplement, initiated additional

<sup>6</sup> Section 106 provided an opportunity for members of the public with a demonstrated interest in the project to participate in the process as consulting parties. Many community members participated in the consultation process. A list of the consulting parties to the Section 106 process is provided in the Programmatic Agreement for the Main Post Update (PA-MPU) (Appendix B of the final SEIS).

<sup>7</sup> The California State Historic Preservation Officer and Advisory Council on Historic Preservation concurred with the revised draft FOE’s finding of adverse effect, enabling the Trust to issue a final FOE on July 6, 2009 and proceed to the resolution phase of the consultation.

consultation under Section 106, and evaluated the mitigated preferred alternative, along with three other previously evaluated alternatives, in the final SEIS.<sup>8</sup>

The mitigated preferred alternative updates the planning concept for the Main Post as described in the Main Post Update, the planning document that accompanied the final SEIS. The Main Post Update, as adopted by the Trust Board of Directors by Resolution 11-6,<sup>9</sup> amends the provisions for the Main Post district in the PTMP and makes the PTMP analysis current.

## 2 NEED FOR MAIN POST UPDATE

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The Trust believes that provisions for the Main Post district in the PTMP need to be amended to fulfill the longstanding goal to make the Main Post the heart of the park. While a community is growing in the Main Post and visitation has increased, the Main Post has not yet become the “focal point for visitor orientation” and “lively pedestrian district”<sup>10</sup> contemplated in the PTMP (pages 62-63).<sup>11</sup> The Presidio’s history is central to the visitor experience at the Main Post. Many of the features that once made the Main Post and its open spaces compelling, however, have been obscured by later additions as well as by building demolition. El Presidio, arguably one of the most important and symbolic historic sites in the country, is all but hidden beneath a parking lot and later construction. The site’s organization and layers of history are therefore hard to discern. A visitor to the Main Post would have difficulty understanding why the Presidio is an important place. Key historic buildings, such as the Presidio Theatre, remain unrehabilitated, vacant, and closed to public entry. Visitor services and activities for the public are insufficient to draw people to the Main Post and make them feel welcomed. The number of people who live and work in the Main Post is well below the level that the district experienced when it was the center of a military post; on most days, the Main Post feels empty. The park has no lodging, a traditional way that national parks have welcomed people, both those who want the experience of an overnight stay in the park and those who visit for a day. Furthermore, much of the Main Post’s infrastructure needs substantial upgrading or replacement to meet current standards and to support new uses. Building and landscape rehabilitation, and future operations and management of the Main Post provide an opportunity to use up-to-date, environmentally favorable practices to make it “greener” and function more smoothly.

<sup>8</sup> As discussed in Section 9 below, the Section 106 consultation was concluded through the execution of a programmatic agreement for the Main Post Update (PA-MPU as provided in Appendix B of the final SEIS) signed by the signatories to the existing programmatic agreement for the treatment and preservation of historic resources at the Presidio: the National Park Service, the State Historic Preservation Officer, the Advisory Council on Historic Preservation, and the Presidio Trust. The mitigated preferred alternative is the undertaking under the terms of the PA-MPU.

<sup>9</sup> Consideration and Adoption of the Main Post Update to the Presidio Trust Management Plan for Area B of the Presidio of San Francisco. Adopted February 23, 2011

<sup>10</sup> PTMP, pages 62-63.

<sup>11</sup> The goal for the Main Post has remained constant since 1994 when the National Park Service stated that the “main post would be the center of visitor activities at the Presidio, and it would offer a variety of programming and interpretation” (final General Management Plan Amendment EIS, page 21).

In order to realize the vision of the Main Post described in the PTMP, the Main Post Update builds on progress to date, responds to new opportunities, and proposes a number of actions that the Trust intends to pursue. As amended by the Main Post Update, the revised PTMP will include the following actions:

- Maintain the Main Post as the heart of the Presidio through rehabilitation, reuse, and interpretation of the remaining historic buildings, formal historic landscapes, and natural and archaeological resources.
- Preserve and refine open spaces by “greening” the Main Parade, commemorating and interpreting the original Spanish settlement, El Presidio, and enhancing physical and visual connections to Crissy Field.
- Retain the transit hub at the north end of the Main Post to provide safe and convenient access to transit.
- Retain the Officers’ Club as a venue for meetings, cultural events, and community activities.
- Establish a Heritage Center at the Main Post.
- Establish an Archaeology Center with a lab and curation facilities.
- Continue existing Presidio administrative functions.
- Collaborate with the National Park Service to develop a Visitor Center and support interpretive functions.
- Use the Anza Esplanade as an opportunity to interpret Presidio history.
- Ensure that new construction is sited to be compatible with the historic district.
- Bring visitor amenities such as lodging and restaurants to make the Main Post the heart of the park.
- Use lighting, signage, and site furnishings to make visitors feel welcome, safe, and comfortable.
- Improve pedestrian access and close portions of Arguello Boulevard and Sheridan Avenue.
- Locate parking on Taylor Street and on Moraga Street on the site of Building 385.

The key difference between the PTMP and the Main Post Update is increased public use. The PTMP provided for more office and residential uses in the Main Post than the Main Post Update does. The Main Post Update reduces the amount of building square footage allocated to those uses and increases the amount of space for cultural, educational, and public-serving uses.<sup>12</sup> For example, the new construction identified in the 2002 PTMP for office use is now proposed for lodging in the Main Post Update. The Main Post Update also identifies square footage dedicated to archaeology and the Presidio’s heritage and calls for public-serving uses in the ground floors of the Montgomery Street Barracks. As indicated in the Main Post Update’s “red-line” version of the Main Post district chapter of the PTMP, the Main Post Update simply adds more detail and more current information to this overarching concept. Further, the PTMP predicted the need for just this type of update when it anticipated that the plan must “be able to accommodate inevitable changes” (PTMP, page vii). The PTMP was adopted as a flexible tool that would

<sup>12</sup> *The Main Post Update also envisions reducing parking on El Presidio to better commemorate the currently buried site.*

allow the Trust “to assess the Plan’s effectiveness on an ongoing basis as individual projects are implemented” (PTMP, page 136). As the PTMP recognized:

*At times planning proposals may be considered that are not entirely consistent with the Plan. These proposals will be fully reviewed and considered under the National Environmental Policy Act (NEPA), including all applicable public processes. The final decision on the proposal may constitute a Plan amendment and will be informed by the NEPA public review process for the proposal. The decision amending the Plan will be adopted by resolution of the Presidio Trust Board. (PTMP, page 136)*

### 3 ALTERNATIVES CONSIDERED IN FINAL SEIS

The final SEIS evaluated four alternatives, each of which proposed different building uses; different amounts of demolition, maximum new construction and total building areas; and different parking and circulation improvements for the Main Post. The alternatives are summarized in Table 1 and briefly described below.

#### 1 ALTERNATIVES INCLUDING THE MITIGATED PREFERRED ALTERNATIVE

	<i>Alternative 1: PTMP Visitor and Community Center</i>	<i>Alternative 2: Main Post Update (Mitigated Preferred Alternative)</i>	<i>Alternative 3: History Center</i>	<i>Alternative 4: Status Quo</i>
EXISTING TOTAL BUILDING AREA (square feet)	1,148,000	1,148,000	1,148,000	1,148,000
MAXIMUM BUILDING AREA (square feet)	1,214,500	1,201,000	1,161,000	1,140,000
MAXIMUM DEMOLITION (square feet)	44,000	94,000	64,000	34,000
MAXIMUM NEW CONSTRUCTION (square feet)	110,000	146,500	77,000	26,000
VISITOR-SERVING USES (square feet)	503,000	576,000	464,000	393,000
ANNUAL VISITORS (millions)	1.38-1.57	1.43-1.69	1.22-1.40	1.11-1.27
PARKING SPACES	1,892	1,910	1,892	1,852

	<i>Alternative 1: PTMP Visitor and Community Center</i>	<i>Alternative 2: Main Post Update (Mitigated Preferred Alternative)</i>	<i>Alternative 3: History Center</i>	<i>Alternative 4: Status Quo</i>
<b>PROPOSED PUBLIC USES</b>	Heritage Center in Building 2 / Visitor Center in Building 50	Heritage Center in a portion of Building 50	Visitor Center in a portion of Building 50	Visitor Center in a portion of Building 50
	Bowling center in Building 93	Public uses in Building 93 at site south of the Main Parade	History Center at site south of the Main Parade	Bowling center in Building 93
	Presidio Theatre and addition (Building 99)	Presidio Theatre and addition	Presidio Theatre with no addition	Presidio Theatre leased out for the highest and best use or mothballed
	Presidio Archaeology Center at Buildings 44, 47, 48 (with addition), and 49	Presidio Archaeology Center at Buildings 44, 47, 48 (with addition), and 49	Presidio Archaeology Center at Buildings 44, 47, 48, and 49 without addition	Presidio Archaeology Center buildings leased out for the highest and best use or mothballed
	Excavation and commemoration of El Presidio with Buildings 40 and 41 and parking	Excavation and commemoration of El Presidio without Buildings 40 and 41 and limited parking <sup>a</sup>	Excavation and commemoration of El Presidio without Buildings 40 and 41 and no parking	Limited excavation and commemoration of El Presidio and parking
	Lodging in Pershing Hall (Building 42) and dormitory rooms for visitors in Buildings 40 and 41	Lodging in Pershing Hall and at Building 34 site	Lodging in Pershing Hall and B&Bs in upper Funston Avenue Officers' Quarters (Buildings 11-16)	Residences in Pershing Hall and dormitory rooms for visitors in Buildings 40 and 41
	Presidio Chapel and addition	Presidio Chapel and addition	Presidio Chapel with no addition	Presidio Chapel with no addition

<sup>a</sup> Decisions are subject to further in-depth design development, Section 106 consultation, and public input as directed in the PA-MPU.

#### Alternative 1: PTMP Visitor and Community Center

Under this alternative, the Main Post would remain the heart of the Presidio as described in the PTMP. The district would be a focal point for visitor orientation and a community center where people live, work, and enjoy themselves. The Main Post's rich collection of historic buildings and landscapes would be the backdrop for visitor programs and a setting for businesses, organizations, and Presidio community services. Significant open spaces would be preserved and restored.

### Alternative 2: Main Post Update

Alternative 2 shares the same vision as Alternative 1 for the Main Post to be the heart of the Presidio. The Main Post would be a welcoming place that serves the community, with the Presidio's history visible and interpreted, and with 21<sup>st</sup> century green practices used to conserve energy and resources and to rehabilitate buildings. Archaeological excavation of El Presidio would unlock the history of the Presidio's founding; landscape treatment would give expression to the buried site and outline the open space of the original *plaza de armas*. A Heritage Center in the nearby Officers' Club would offer opportunities to explore the history of the Presidio and the American West and would house the education facilities of the Archaeology Center. The new Presidio Lodge would welcome visitors and animate the Main Parade.

### Alternative 3: History Center

Alternative 3 is based on a proposal from the Presidio Historical Association. A new History Center at the site south of the Main Parade would be the primary interpretive facility, serving as both "an anchor and a portal" to receive and orient visitors to the historic Main Post. Preference would be given to those uses that perpetuate the Presidio's military legacy and tradition, provide opportunities for joint resource preservation programs, and/or enrich educational and other program elements. Tenants would be selected over the long term based on their ability to support park programs and activities and retain the district's sense of community and the past.

### Alternative 4: Status Quo

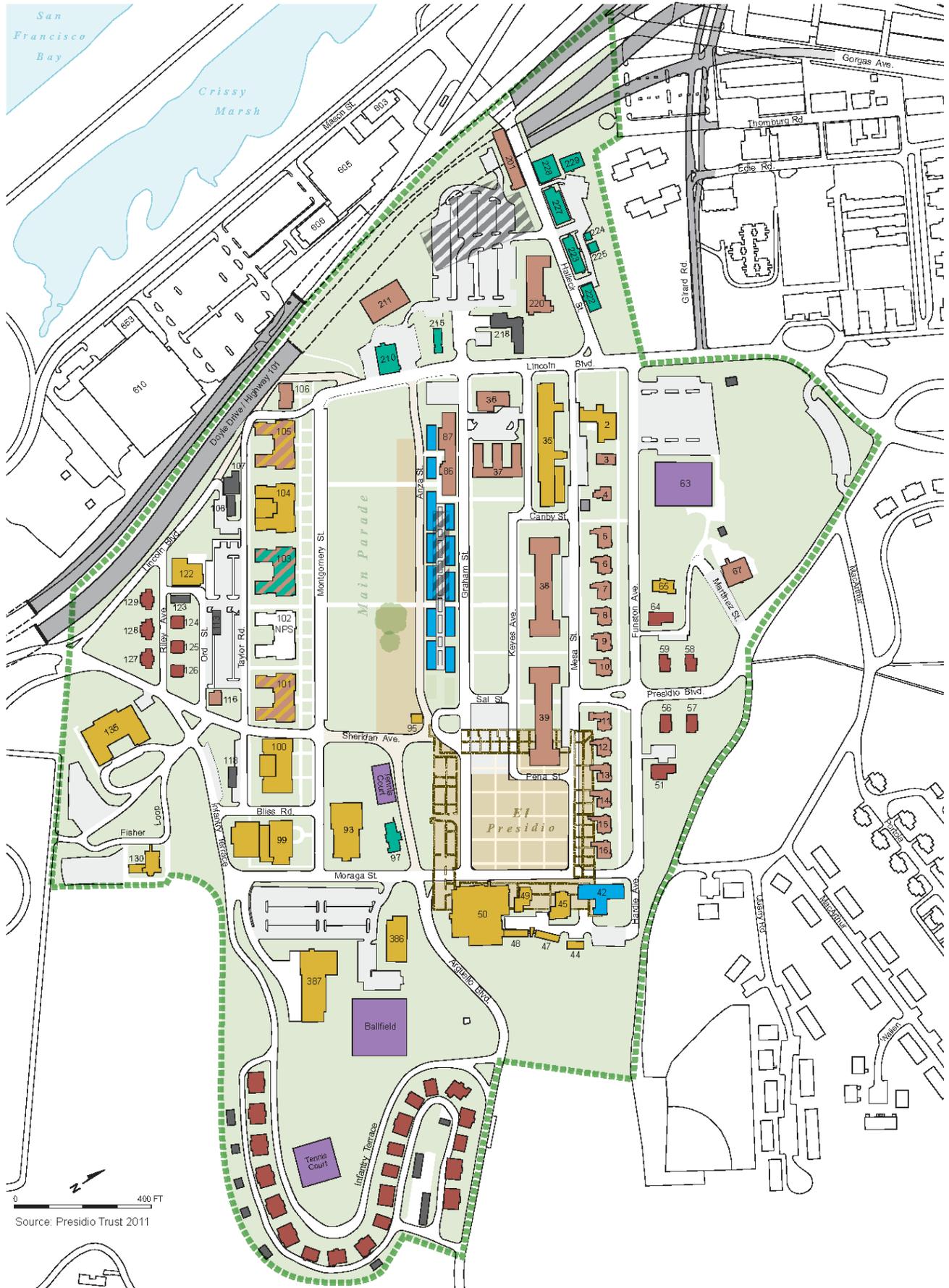
Under this alternative, no significant park enhancements or physical change beyond that already permitted or underway would occur in the district, i.e., there would be no further building demolition or new construction, and existing buildings and activities would remain. Buildings would be rehabilitated to meet essential code requirements, consistent with the Secretary of the Interior's Standards, and then leased out for the highest and best use (generally mixed-use office). The Trust would seek tenants that could help fund the preservation and enhancement of the Presidio's resources and meet the needs of the park's visitors and community alike.

## 4 SELECTED ALTERNATIVE AND BASIS FOR DECISION

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The Trust has selected the mitigated preferred alternative (Alternative 2: Main Post Update) for adoption and implementation subject to the terms set forth in the PA-MPU (see Figure 1). The Trust's decision is based upon a thorough analysis of the alternatives and their potential environmental consequences, consideration of all public and agency participation and concerns raised during the NEPA and NHPA Section 106 processes, and consideration of the mandates of the Trust Act together with the plan set out in the PTMP. The selected alternative best meets the Trust's statutory duties and authorities, taking into account economic, environmental, technical and other factors, including its commitment to preserve the Presidio's NHLD status. The selected alternative best fulfills the Trust's stated purpose of the project and conditions of need, and best achieves the Trust's objectives. The following objectives outlined in Section 1 of the final SEIS and expressed as implementation strategies in the Main Post Update are derived from planning principles and policies set forth in the PTMP:

1 SELECTED ALTERNATIVE (ALTERNATIVE 2: MAIN POST UPDATE)



- |                             |        |             |                |                        |                     |
|-----------------------------|--------|-------------|----------------|------------------------|---------------------|
| Main Post Planning District | Retail | Residential | Lodging        | Cultural / Educational | Surface Parking     |
| Paved Pedestrian Area       | Office | Recreation  | Infrastructure | NPS                    | Below-Grade Parking |

- *Reveal the Presidio's history*

Revealing and elevating the Presidio's history is an important goal for the Trust and key to the vision of the Main Post. At the Main Post, ongoing archaeological investigations of El Presidio have added enormously to the record of life of the Presidio during the 18<sup>th</sup> and 19<sup>th</sup> centuries, and provide a platform for educational programs focused on the Spanish colonial era and early California history. Under the selected alternative, visitors will have greater opportunities to explore the history of the Presidio's founding and its first hundred years. Removal or relocation of Buildings 40 and 41, subject to further in-depth design development, Section 106 consultation and public input, will re-establish the spatial character and build on the interpretive potential of El Presidio; landscape treatments will enhance interpretation of the original fortification. Parking will be reduced, and roads will be periodically closed to accommodate excavations and public programs. The new state-of-the-art Archaeology Lab and Curation Facilities will support the ongoing excavation at El Presidio and will increase the Presidio's capacity for archaeology programs. The new Heritage Center located within a portion of the historic Officers' Club will complement the archaeology program. Innovative heritage programming will be introduced to bring forth the significance of the Main Post's physical organization and to allow the many layers of its history to be discernable.

- *Welcome the public*

The Trust intends to build on all the work that has already been accomplished under the PTMP to make the Main Post more inviting to the public. However, the selected alternative will allocate additional space to cultural, educational, and public services, which will bring more amenities and programs to the Main Post than anticipated in the PTMP. Proposed public-serving uses will be located in the Officers' Club, the Presidio Lodge, the first floors of the rehabilitated Montgomery Street Barracks, and the Presidio Theatre and Presidio Chapel. The Officers' Club will be a social hub as well as a destination for visitors to learn about the park's heritage. The Presidio Lodge will give visitors an opportunity to spend the night in the park, and will animate a transformed Main Parade and new pedestrian walkway, the Anza Esplanade. Cultural and visitor-serving uses will occupy the ground floors of the Montgomery Street Barracks buildings, and will access the historic porches facing the Main Parade. The Presidio Theatre and Presidio Chapel will be rehabilitated and reused for their original purposes, and expansions will allow for enhanced programming and accessibility. In addition, cars and traffic will be minimized to make the Main Post more welcoming, and parking around the perimeter of the Main Post and new walkways will link visitors to attractions and amenities, making the Main Post easy to navigate and pedestrian-friendly. These changes and others proposed in the selected alternative will advance the Trust's vision of making the Main Post a visitor destination befitting a premier national park site.

- *Employ 21<sup>st</sup> century green practices*

The Trust strives to meet federal goals related to strengthening federal environmental, energy, and transportation management through its capital investment program, and internal agency operations and activities. Since 2002, the Trust has broadened the concept of sustainability to include historic preservation and park operations, not just building materials or maintenance. Sustainable design

criteria are being applied to new construction as well as to historic facilities, integrating sustainable materials and systems to the extent feasible. Under the selected alternative, the Trust will demonstrate at the Main Post how current sustainable design and green practices can be used to rehabilitate an NHLD. New construction and building rehabilitation will be designed to achieve a Leadership in Energy and Environmental Design (LEED) Silver rating or better. Sustainable design features such as green roofs and photovoltaic panels will be carefully located to avoid detracting from the historic character of the Main Post. Main Post landscapes will be plumbed for irrigation with reclaimed water. Stormwater runoff will be reduced and cleaned with features such as bio-swales and permeable pavement. Integrated pest management and green waste composting will reduce the environmental impacts of park maintenance. The Main Post's transportation network will support pedestrians and cyclists and provide alternatives to automobiles. The PresidiGo shuttle system will be expanded to serve more Main Post employees and visitors. Transportation demand management and parking management programs will encourage the use of alternative transportation and reduce the number of single-occupancy vehicle trips. Electric vehicle (EV) and plug-in hybrid electric vehicle (PHEV) charging infrastructure will be available at major parking lots to encourage the use of low- and no-emission vehicles. This wide array of Main Post projects and initiatives will prevent pollution, reduce waste, and promote alternative modes of transportation and fuel, and will advance the Trust's primary objectives of safety, efficiency, and long-term sustainability for park operations and infrastructure.

The selected alternative will allow for an increase in the amount of building demolition and new construction in the Main Post, but the net building square footage in the district will ultimately be less than was identified in the PTMP (see Table 1). As stated in the PTMP, "new construction may take the form of a building addition, an annex adjacent to an existing building, infill buildings set within an existing building cluster, or standalone structures in developed areas to replace square footage removed in that location or elsewhere" (PTMP, page 6). The amount of new construction identified in the selected alternative is 146,500 square feet, which is 36,500 more square feet than provided for in the PTMP. Aggregate or "banked" square footage from demolished structures in the Main Post as well as elsewhere in the Presidio would be used to offset the new construction. The park-wide cap of 5.6 million square feet of building space that the Trust committed to in the PTMP would not change. This model of using "banked" square footage was inherent in both the Letterman ROD of 2000 and in the 2007 Public Health Service Hospital ROD. It is in keeping with the comprehensive program for the management of the Presidio lands and facilities adopted by the Trust as part of the PTMP.

## **5 REASONS FOR REJECTION OF OTHER ALTERNATIVES**

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In addition to the bases set out above for selecting the mitigated preferred alternative as the updated planning concept for the Main Post, the Trust has considered the following factors in choosing not to select other alternatives.

### **Alternative 1: PTMP Visitor and Community Center**

This alternative was rejected because it 1) proposes new construction for office use instead of lodging in the same general location; 2) allocates insufficient space to cultural, educational, and public-serving uses;

and 3) continues with existing parking practices on El Presidio that diminish the ability to enhance its open space. The Trust believes that the limited lodging opportunities, the extent of office and residential use, and the reduced ability to interpret El Presidio that would result from this alternative would not fulfill the Main Post's promise as the heart of the park and as a destination for visitors.

#### Alternative 3: History Center

This alternative was rejected because 1) the Trust believes that the alternative's programmatic vision, i.e., the traditional concept of a history museum as the alternative's cornerstone, is neither the only nor necessarily the most compelling approach to interpreting the history at the Presidio, as the Trust mission encompasses more than a history focus alone, and the park itself serves as a unique "museum without walls"; 2) the alternative's preference for selecting tenants (based on their relationship to the Presidio's history, and their ability to support park history programs and activities and retain the district's sense of community and the past) would unduly limit an already limited pool of tenants willing to locate at the Presidio and contribute toward the timely rehabilitation of its buildings and landscapes and preservation of its resources; and 3) the alternative's proponent for the History Center lacks a collection or a source of funding to undertake the proposed capital improvements or maintain the facility.

#### Alternative 4: Status Quo

This alternative was rejected because it would not ensure the proper preservation, rehabilitation, and use of the historic buildings and landscapes that define the Main Post's character. Mothballing of the buildings would only provide sufficient protection for a period of a few years, and would only slow down the deterioration of the buildings while they remain vacant. De-activated buildings and buildings leased out for the highest and best use (generally mixed-use office) would provide neither an attraction for visitors nor a standard of programming suitable to a national park.

## 6 IDENTIFICATION OF ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The environmentally preferable alternative is the alternative that best promotes the NEPA's goals. In general, this refers to the alternative that causes the least damage to the environment and best protects cultural and natural resources. Identification of the environmentally preferable alternative is subjective and requires a certain amount of judgment on the part of the federal agency decision maker.<sup>1</sup> In practice, one alternative may be preferable for some environmental resources while another alternative may be preferable for other resources. This view holds true for the alternatives that were considered for the Main Post. However, after balancing one environmental value against another, the Trust has determined that the selected alternative (Alternative 2: Main Post Update) is the environmentally preferable alternative.<sup>2</sup>

<sup>1</sup> *CEQ Forty Questions No. 6(a).*

<sup>2</sup> *Although the CEQ regulations require the identification of the environmentally preferable alternative, it is not required that this alternative be adopted.*

On its face, Alternative 4 would appear to be the environmentally preferable alternative because when compared to the others, it would result in the least physical changes to the environment, i.e., the least amount of demolition, new construction, car trips, air and noise emissions, and visitor use. However, as shown in Table 2, when weighed against the NEPA’s goals,<sup>3</sup> it becomes apparent that this alternative is the least environmentally preferable because, among other reasons, it poses the greatest risk to historic resources. Under this alternative, buildings may be mothballed. However, ensuring that buildings would be in stable condition for an extended period of time (i.e., until their eventual rehabilitation) may prove difficult. Over the long term, if such measures are unsuccessful, non-productive buildings waiting to be “recycled” at a later date would not contribute to the preservation and enhancement of the Main Post’s visual and historic environment, the vitality of the Main Post, or the financial viability of the Presidio, which would not further NEPA Goals 1, 2, 4 (first part), and 6.

2 RELATIONSHIP OF ALTERNATIVES TO NEPA GOALS

<i>Goals Outlined in NEPA Section 101</i>	<i>Alternative 1: PTMP Visitor and Community Center</i>	<i>Alternative 2: Main Post Update</i>	<i>Alternative 3: History Center</i>	<i>Alternative 4: Status Quo</i>
1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations	▲	▲	▶	▼
2) assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings	▶	▲	▲	▼
3) attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences	▶	▲	▶	▼
4) preserve important historic, cultural, and natural aspects of our national heritage, and maintains, wherever possible, an environment which supports diversity, and variety of individual choice	▲	▲	▶	▼

<sup>3</sup> *The goals characterizing the environmentally preferable condition are described in Section 101 of the NEPA, which states that "...it is the continuing responsibility of the Federal Government to... 1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; 2) assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings; 3) attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences; 4) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice; 5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities; and 6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources."*

<i>Goals Outlined in NEPA Section 101</i>	<i>Alternative 1: PTMP Visitor and Community Center</i>	<i>Alternative 2: Main Post Update</i>	<i>Alternative 3: History Center</i>	<i>Alternative 4: Status Quo</i>
5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities	—	—	—	—
6) enhance the quality of renewable resources and approaches the maximum attainable recycling of depletable resources	▲	▲	▲	▼
<b>SUMMATION OF GOALS</b>	▲	▲	▶	▼

*Notes:* ▲ = fully contributes to achieving NEPA goal  
▶ = somewhat contributes to achieving NEPA goal  
▼ = does not contribute to achieving NEPA goal  
— = has no bearing on achieving NEPA goal

Alternative 4 has the highest concentration of mixed-use office in comparison to the other alternatives, offering the narrowest range of benefits and even potentially resulting in undesirable consequences (i.e., the Main Post could eventually function much like a business park). It therefore would not achieve NEPA Goal 3. Under this alternative, El Presidio, an important cultural resource, would indefinitely remain obscured, further impeding NEPA Goal 4 (first part). Finally, the alternative's emphasis on highest and best use, reliance on tenants to provide public programs, and lack of overnight accommodations would limit diversity and variety of experience to visitors, which would not achieve NEPA Goal 4 (second part).

Alternatives 1 and 3 also have environmental shortcomings that would not fulfill the policies of the NEPA. The proponent of Alternative 3's inability to fund its centerpiece, the History Center south of the Main Parade, would not contribute to the Trust's statutory mission, and therefore NEPA Goal 1 would not be advanced. Continued parking on El Presidio would not be considered the most beneficial or visually appealing use of the historic site, and thus would fall short of achieving NEPA Goals 2 and 3. Alternatives 1 and 3 provide limited overnight accommodations and Alternative 3 single focus on Presidio history would narrow the range of benefits, with little diversity of experience for visitors and therefore would not fully realize NEPA Goals 3 and 4 (second part). Finally, the location, size, and scale of the History Center would have an adverse impact on the historic environment, and therefore would fall short of attaining NEPA Goal 4 (first part).

When faced with a choice among the alternatives, the selected alternative (Alternative 2) is considered to be environmentally preferable. While the selected alternative would result in the most physical changes to the environment, all practicable means to avoid or minimize environmental harm would be adopted (see below). The selected alternative integrates specific preservation priorities for the Main Post into the Presidio's overall management framework, which supports preservation planning for the Main Post. The

selected alternative fully avoids, minimizes, or mitigates the adverse impact on the historic environment, and therefore is the alternative that best protects historic resources.

The selected alternative most closely carries forth the vision for the Main Post that has existed since the Presidio became a national park site in 1994, and therefore best fulfills the promise as the “heart of the park” for future generations. In addition to the widest range of beneficial uses, the selected alternative offers the most public places, the most diverse programming, and the most opportunities for overnight accommodations, thus providing the greatest variety of individual choice. Finally, the selected alternative responds to concerns raised by most members of the public who have participated in the environmental and historic review processes.<sup>4</sup> For these reasons and for the shortcomings of the other alternatives discussed above, the Trust finds that the selected alternative is the most effective of the alternatives in achieving and promoting national environmental policy goals.

## **7 MEASURES TO LESSEN OR AVOID POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACTS**

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The Trust will implement, as necessary, all mitigation measures identified in the final SEIS, which include avoidance, minimization or mitigation measures that have been stipulated in the PA-MPU, to reduce the significance of environmental impacts that could result from the selected alternative, and will coordinate with other public agencies as necessary. These mitigation measures are discussed in more detail at the end of each impact analysis in Section 3 of the final SEIS. As part of the decision to implement the selected alternative, the Trust will adopt and implement a monitoring and enforcement program (MEP) to ensure that each mitigation measure is carried out. The MEP has been formatted as a table, and is appended to this ROD as Attachment A. For measures that fall outside the jurisdiction of the Trust, the Trust will assist and encourage other agencies to implement the measures, and will monitor their performance. The Trust will make available the status and results of mitigation monitoring to other agencies and to the public upon request. The Trust’s project managers will be responsible for monitoring compliance with the MEP.

## **8 PUBLIC INVOLVEMENT**

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Public participation was an important part of the NEPA process for the Main Post Update. The Trust provided multiple opportunities for public involvement during scoping and public review of the environmental documents. Trust efforts to involve the public included:

- holding 7 formal public hearings attended by approximately 1,800 individuals
- conducting 6 workshops attended by approximately 350 individuals
- leading guided walks and tours attended by more than 1,500 individuals
- maintaining a Trust-staffed, drop-in information center

<sup>4</sup> *CEQ Forty Questions No. 6(a) also indicates that the comments from the public and other agencies can assist the lead agency’s determination.*

- presenting and fielding questions at numerous independently sponsored meetings by various organizations, including neighborhood groups, resource-conservation organizations, professional and civic associations, and various commissions of the City and County of San Francisco, including the Planning Commission and Landmarks Preservation Advisory Board (now Historic Preservation Commission)
- making environmental documents and supporting materials available on the Trust's web site
- inviting public comments during extended public review periods (lasting over a year for the draft SEIS and almost three months for the supplement to the draft SEIS)

During the course of the NEPA process for the Main Post Update, the Trust heard approximately 450 speakers and received upwards of 3,100 pieces of correspondence<sup>5</sup> commenting on the proposals in the Main Post Update. Section 4 of the final SEIS provides a detailed summary of public involvement during the NEPA process for the Main Post Update.

## 9 AGENCY CONSULTATION

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Concurrent with the NEPA process, the Trust also provided for review of the proposals in the Main Post Update through the consultation process required by Section 106 of the NHPA. The Section 106 consultation process was pivotal in developing the selected alternative and in avoiding and minimizing potential effects on the NHLD. Section 106 activities included:

- establishing the project Area of Potential Effects (APE)
- identifying historic properties in the APE
- consulting with the State Historic Preservation Officer, the Advisory Council on Historic Preservation, and the National Park Service as signatory parties to the PTMP programmatic agreement
- providing an opportunity for interested members of the public, including representatives from neighborhood groups and historic preservation organizations, to participate in the process and comment on the undertaking (i.e., the Main Post Update) as consulting parties
- developing strategies for key proposals to conform to the Secretary of the Interior's Standards for Rehabilitation
- assessing effects on historic properties within the APE through Finding of Effect (FOE) documents
- reaching agreement in resolving the adverse effects through the execution of a programmatic agreement

The process culminated in the programmatic agreement for the Main Post Update (PA-MPU) that established terms and parameters for implementing the undertaking. The Advisory Council on Historic

<sup>5</sup> Including petitions and form letters. Comment letters are available for review at the Presidio Trust Library and constitute part of the formal public record.

Preservation (ACHP) commended the Trust for its “hard work and dedication in reaching a successful conclusion to the Section 106 process.”<sup>6</sup> Section 4 of the final SEIS provides a detailed summary of the Section 106 consultation process for the Main Post Update. The PA-MPU is provided in Appendix B of the final SEIS.

## 10 IMPLEMENTATION OF MAIN POST UPDATE

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The Trust currently employs a design and construction review process as part of its permitting process for building and landscape rehabilitation projects. This review process ensures NEPA and code compliance as well as compliance with the National Historic Preservation Act and the Secretary of the Interior’s Standards. The design review process for proposals within the Main Post Update will follow project descriptions and applicable design guidelines described in the Main Post Update and attendant NHPA compliance documents (such as the PA-MPU). The Trust or project applicants may seek more public and historic preservation agency input in the design phase as warranted. Construction permit review will follow the process that is already in place.

## 11 COMMENTS ON FINAL SEIS

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The U.S. Environmental Protection Agency (EPA) published a notice of availability of the final SEIS in the Federal Register on November 26, 2010.<sup>7</sup> A 30-day wait period after notice of the final SEIS in which the Trust accepted public comments on the final SEIS ended on December 27, 2010.<sup>8</sup> During or shortly after the wait period, 11 parties submitted 12 written letters and electronic mails, including the U.S. Environmental Protection Agency (EPA) and the National Park Service (NPS), both of whom commended the Trust. The EPA stated that the final SEIS addressed its concerns and it thanked the Trust for the information in the final SEIS regarding the potential impacts to air quality and cumulative effects of the Main Post Update on historic resources.<sup>9</sup> The NPS commended the Trust for “reaching an important milestone in its planning for the future of the Main Post,” and appreciated the Trust’s efforts to address many comments and concerns provided during the review process and the “significant process that has been made,” despite identifying outstanding and new concerns.<sup>10-11</sup> Also, on February 7, 2011, the Trust

<sup>6</sup> Letter of October 26, 2010 from John M. Fowler, Executive Director, ACHP to Craig Middleton, Executive Director, Presidio Trust. Ref: Main Post Update to the Presidio Trust Management Plan, Presidio of San Francisco National Historic Landmark, San Francisco, California (CEQ #20100452).

<sup>7</sup> 75 FR 72823.

<sup>8</sup> In light of the holiday season, the Trust granted requests from the National Park Service and several consulting parties to the Section 106 process to accept late comments on the final SEIS until January 14, 2011, and then again until January 28, 2011. Comment letters are available for review at the Presidio Trust Library and constitute part of the formal public record.

<sup>9</sup> Letter of December 17, 2010 from Kathleen M. Goforth, Manager, Environmental Review Office, EPA Region IX to John Pelka, Presidio Trust. Subj: Final SEIS for the PTMP Main Post Update, San Francisco, California (CEQ #20100452).

<sup>10</sup> Letter of January 14, 2011 from Frank Dean, General Superintendent, Golden Gate National Recreation Area to Craig Middleton, Executive Director, Presidio Trust (Ref: D18; GOGA-PLAN).

<sup>11</sup> See Attachment B for responses to comments raised in NPS’ January 14, 2011 letter to the Trust.

Board of Directors held a public meeting at which 31 individuals expressed their views on the Main Post Update and final SEIS,<sup>12</sup> including the President of the city’s Historic Preservation Commission who noted “how excellent the Presidio is accomplishing its responsibilities in historic preservation.” Four of the speakers or their organizations also submitted a written comment letter generally reflecting the oral comments. Table 3 lists public agencies, organizations, and individuals providing written and oral comments.

### 3 PUBLIC AGENCIES, ORGANIZATIONS, AND INDIVIDUALS COMMENTING ON THE PTMP MAIN POST UPDATE FINAL SEIS

<b>PUBLIC AGENCIES</b>	United States Department of the Interior, National Park Service, Golden Gate National Recreation Area United States Environmental Protection Agency, Region IX, Environmental Review Office City and County of San Francisco, Historic Preservation Commission*		
<b>ORGANIZATIONS</b>	Cow Hollow Association* Descendants of the Anza & Portolá Expeditions Earthjustice on behalf of the National Parks Conservation Association Los Californianos National Parks Conservation Association* National Trust for Historic Preservation* Presidio Environmental Council* Presidio Historical Association Presidio Interfaith Center* San Francisco Tomorrow*		
<b>INDIVIDUALS</b>	Rita Agnese Janet Bolles* Didi and Dix Boring Moirra Brennan* Maurice Franco* Sharon Gadberry* Donald S. Green (2) John J. Griffin Scott Haskins*	Charlotte Hennessey* J.J. Johnstone Kari Kiser* Amy Meyer* Victor Meyerhoff* Jamie Miller* Verna Shaheen* Bill Sheppard* Mark A. Sherman*	Merv Silberberg* Rita South* Jay Turnbull* Matt Waldman* Barbara Wanvig* Paul Wermer* Margaret Ziegart*

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*\*Oral comments at February 7, 2011 Trust Board of Directors meeting only.*

Attachment B provides a summary of and responses to all substantive issues raised by the comments received during and following the wait period. Attachment C includes an errata sheet that provides minor text changes that have resulted from comment. The comments received and the text changes in response do not give rise to new issues or circumstances relevant to environmental concerns and bearing on the Main Post Update or its impacts that would warrant the Trust modifying the selected alternative or reconsidering the conclusions reached in Section 3 of the final SEIS.

<sup>12</sup> A transcript of the meeting is available for review at the Presidio Trust Library and constitutes part of the formal public record.

## 12 CONCLUSION

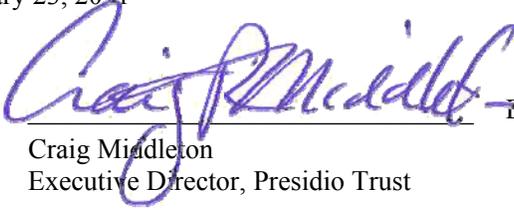
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In accordance with the provisions of the NEPA, the Trust has considered all of the information in the final SEIS and the complete record, including all public comments received. All of the above factors and considerations warrant selection of Alternative 2: Main Post Update, identified as the mitigated preferred alternative in the final SEIS, as the Trust's updated planning concept for implementation within the Main Post district within the Presidio of San Francisco. This final decision, which will become effective upon execution, will enable the Trust to move forward and implement the selected alternative.

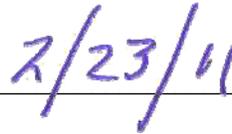
This record of decision concludes the formal NEPA process for the Main Post Update. For more information on this decision, contact John Pelka, Compliance Manager, at 415/561-4183, or at the Presidio Trust, 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052.

Dated: February 23, 2011

APPROVED: \_\_\_\_\_

  
Craig Middleton  
Executive Director, Presidio Trust

DATE: \_\_\_\_\_



# Attachment A PTMP Main Post Update Mitigation Monitoring and Enforcement Program<sup>1</sup>

<i>Mitigation Measure</i>	<i>Implementation Timing</i>	<i>Person/Party Responsible</i>	<i>Compliance Verification Mechanism</i>	<i>Reference</i>
<b>LAND USE</b>				
CO-1 <i>Monitoring of Area B Uses</i> Review proposed uses for buildings for their consistency with the Presidio Trust Management Plan (PTMP) Planning Principles to ensure protection of the Presidio’s cultural, natural, scenic, and recreational resources. Consult with the National Park Service (NPS) for all activities that would have the potential to significantly affect Area A resources.	Pre-Construction	Trust	Project Documentation for Execution of Lease Agreement or Project Approval	Final SEIS Section 3.1
<b>TRANSPORTATION</b>				
TR-1 <i>Presidio Boulevard/Pacific Avenue Intersection Improvements</i> Install a traffic signal to improve the operation of the intersection to an acceptable level of service. If the City and County of San Francisco (CCSF) determines that signalization is appropriate, coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.	When Needed (i.e., Prior to the Level of Service Deteriorating to LOS E or F)	CCSF/Trust	Incorporation of Terms and Conditions into CCSF/Trust Agreement on Intersection Improvements	Final SEIS Section 3.3
TR-4 <i>Lombard Street/Presidio Boulevard Intersection Improvements</i> Signalize the intersection to improve its operation to an acceptable level of service.	When Needed (i.e., Prior to the Level of Service Deteriorating to LOS E or F)	Trust	Trust Capital Plan	Final SEIS Section 3.3
TR-12 <i>Lyon Street/Lombard Street Intersection Improvements</i> Signalize the intersection to improve its operation to an acceptable level of service. If the CCSF determines that signalization is appropriate, coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.	When Needed (i.e., Prior to the Level of Service Deteriorating to LOS E or F)	CCSF/Trust	Incorporation of Terms and Conditions into CCSF/Trust Agreement on Intersection Improvements	Final SEIS Section 3.3
TR-14 <i>Letterman Drive/Presidio Boulevard/Lincoln Boulevard Intersection Improvements</i> Install a traffic signal to improve the operation of the intersection to an acceptable level of service.	When Needed (i.e., Prior to the Level of Service Deteriorating to LOS E or F)	Trust	Trust Capital Plan	Final SEIS Section 3.3

<sup>1</sup> These mitigation measures were established in the PTMP Main Post Update final SEIS or during its review and will be adopted and implemented by the Trust as part of the decision.

<i>Mitigation Measure</i>	<i>Implementation Timing</i>	<i>Person/Party Responsible</i>	<i>Compliance Verification Mechanism</i>	<i>Reference</i>
<p><b>TR-24 Presidio Avenue/Jackson Street Intersection Improvements</b> Signalize the intersection to improve its operation to an acceptable level of service. If the CCSF determines that signalization is appropriate, coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.</p>	When Needed (i.e., Prior to the Level of Service Deteriorating to LOS E or F)	CCSF/Trust	Incorporation of Terms and Conditions into CCSF/Trust Agreement on Intersection Improvements	Final SEIS Section 3.3
<p><b>TR-25 Presidio Avenue/Washington Street Intersection Improvements</b> Signalize the intersection to improve its operation to an acceptable level of service. If the CCSF determines that signalization is appropriate, coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.</p>	When Needed (i.e., Prior to the Level of Service Deteriorating to LOS E or F)	CCSF/Trust	Incorporation of Terms and Conditions into CCSF/Trust Agreement on Intersection Improvements	Final SEIS Section 3.3
<p><b>TR-26 Arguello Boulevard/Washington Street Intersection Improvements</b> Signalize the intersection to improve its operation to an acceptable level of service. If the CCSF determines that signalization is appropriate, coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.</p>	When Needed (i.e., Prior to the Level of Service Deteriorating to LOS E or F)	CCSF/Trust	Incorporation of Terms and Conditions into CCSF/Trust Agreement on Intersection Improvements	Final SEIS Section 3.3
<p><b>TR-27 Lincoln Boulevard/Girard Road Intersection Improvements</b> Signalize the intersection to improve its operation to an acceptable level of service.</p>	When Needed (i.e., Prior to the Level of Service Deteriorating to LOS E or F)	Trust	Trust Capital Plan	Final SEIS Section 3.3
<p><b>TR-28 Lincoln Boulevard/Graham Street Intersection Improvements</b> Signalize the intersection to improve its operation to an acceptable level of service.</p>	When Needed (i.e., Prior to the Level of Service Deteriorating to LOS E or F)	Trust	Trust Capital Plan	Final SEIS Section 3.3
<p><b>TR-29 Lincoln Boulevard/Halleck Street Intersection Improvements</b> Signalize the intersection to improve its operation to an acceptable level of service.</p>	When Needed (i.e., Prior to the Level of Service Deteriorating to LOS E or F)	Trust	Trust Capital Plan	Final SEIS Section 3.3
<p><b>TR-18 Presidio-Wide Parking Management</b> In order to reduce impacts of fee parking in Area B on parts of the Presidio outside the Trust’s jurisdiction (Area A), implement parking regulations, time limits, and/or parking fees in potentially affected parking areas under its administration (notably, Crissy Field). Provide assistance to the NPS to ensure coordination and consistency of parking management within both Areas A and B.</p>	Pre-Construction	NPS/Trust	Implementation of Specific Parking Management Strategies	Final SEIS Section 3.3
<p><b>TR-19 TDM Program Monitoring</b> Periodically monitor implementation and effectiveness of the transportation demand management (TDM) program. If TDM performance standards as described in the PTMP are not being reached, implement more aggressive TDM strategies or intensify components of the existing TDM program such as requiring tenant participation in more TDM program elements, and more frequent and/or extensive shuttle service.</p>	Post-Construction	Trust	Incorporation of Strategies into TDM Program	Final SEIS Section 3.3

<i>Mitigation Measure</i>	<i>Implementation Timing</i>	<i>Person/Party Responsible</i>	<i>Compliance Verification Mechanism</i>	<i>Reference</i>
TR-21 <i>Special Event Parking Management</i> Coordinate special events that could result in overflow parking to ensure that parking supply is not exceeded. Schedule special events based on parking availability and regulate to ensure that supply meets expected demand, including demand from Area A of the Presidio. Do not schedule events requiring large amounts of parking concurrently with other events or Presidio peak parking demand periods if combined parking demand would exceed the available supply within Area B of the Presidio. Require sponsors as necessary to provide special transit and bicycle services during their events to reduce expected parking demand and promote use of public transit, biking, walking, and remote parking lots.	Post-Construction	Trust	Incorporation of TDM Measures into Special Use Permit	Final SEIS Section 3.3
TR-9 <i>Pedestrian/Bicycle Amenities</i> Provide bicycle and pedestrian amenities such as shelters, benches, water fountains, secure bicycle racks, route lighting, and other facilities throughout the Presidio to encourage travel by foot and bicycle.	Post-Construction	Trust	Trust Capital Plan	Final SEIS Section 3.3
TR-10 <i>Support Increased Muni Frequencies</i> Increase frequency of service on existing Muni lines with or without any extensions of these lines to increase the transit peak hour capacity and reduce passenger load factors. If service on Muni routes serving the Presidio is reduced from current levels, increase PresidiGo service levels to accommodate the displaced transit demand and coordinate with Muni to improve transfers between PresidiGo and Muni.	Post-Construction	Muni/Trust	Incorporation of Specific Strategies into Muni and PresidiGo Service Development Framework	Final SEIS Section 3.3
TR-22 <i>Transit Service Monitoring Program</i> Continue to monitor Muni operations and passenger loads within the Presidio to indicate any capacity problems, particularly on northbound Golden Gate Transit bus service during the PM peak hour. If monitoring reveals insufficient capacity for northbound Presidio-generated passengers during the PM peak hour, coordinate potential improvements with the Golden Gate Bridge, Highway, and Transportation District (GGBHTD).	Post-Construction	Trust/GGBHTD	Incorporation of Specific Strategies into Transit Operations Plan and Budget	Final SEIS Section 3.3
TR-23 <i>Construction Traffic Management Plan</i> Develop a Construction Traffic Management Plan to include information on construction phases and duration, scheduling, proposed haul routes, permit parking, staging area management, visitor safety, detour routes, and pedestrian movements on adjacent routes. Review Construction Traffic Management Plans for individual projects with consideration of other individual projects in the Main Post as well as Doyle Drive reconstruction.	Pre-Construction and Construction	Trust/San Francisco County Transportation Authority/Contractors	Incorporation of Strategies into Construction Traffic Management Plan	Final SEIS Section 3.3
<b>AIR QUALITY</b>				
NR-20 <i>Basic Control Measures</i> To reduce construction-generated particulate matter (PM10 and PM2.5) emissions, implement as appropriate the Bay Area Air Quality Management District's (BAAQMD) recommended control measures for emissions of dust during construction.	Construction	Trust/Contractors	Incorporation of Measures into Contract Specifications	Final SEIS Section 3.4 BAAQMD Guidelines

<i>Mitigation Measure</i>	<i>Implementation Timing</i>	<i>Person/Party Responsible</i>	<i>Compliance Verification Mechanism</i>	<i>Reference</i>
<p><b>NR-21 <i>Transportation Control Measures (TCMs)</i></b>                      Implement the TCMs of the 2000 Clean Air Plan (CAP) and applicable TCMs of the 2010 CAP to minimize air emissions from Presidio-related activities. In addition, consistent with the 2000 CAP, coordinate land uses to provide buffer zones and avoid conflicts from toxic contaminants or odors.</p>	Post-Construction	Trust	Incorporation of Measures into Transportation Demand Management Program	Final SEIS Section 3.4  2000 CAP  2010 CAP Program
<p><b>NR-22 <i>Deconstruction/Demolition Techniques</i></b> To the extent feasible, apply an environmentally effective approach, including a combination of deconstruction and demolition techniques, to remove outdated structures and to reduce PM10 and PM2.5 emissions from demolition.</p>	Construction	Trust/Contractors	Incorporation of Condition into Demolition Permit	Final SEIS Section 3.4
<p><b>NR-23 <i>Construction Equipment Exhaust Measures</i></b> To reduce construction-related equipment exhaust of particulate matter and ozone precursors, use control technologies on construction equipment in order to reduce the emissions per the U.S. Environmental Protection Agency (EPA) Tier 4 emission standards which are to be phased in over the period of 2008-2015.</p>	Construction	Trust/Contractors	Incorporation of Measures into Contract Specifications	Final SEIS Section 3.4  EPA Tier 4 Emission Standards
<p><b>NR-26 <i>Climate Friendly Parks Program Participation</i></b>                      Consistent with applicable law and subject to the availability of appropriate funding, meet greenhouse gas (GHG) emissions reductions comparable to California's statutory requirements: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; by 2050, reduce GHG emissions to 80 percent below 1990 levels. Develop an inventory of park-based GHG emissions, identify and implement sustainable strategies to mitigate these emissions and adapt to climate change impacts, and educate the public about these efforts. Use environmental management systems (EMS) as the primary management approach for addressing these actions, and for collecting, analyzing and reporting of information. Summarize results of the park's emission inventory and the identified mitigation actions and associated emissions reductions in a narrative document (Action Plan) intended for viewing by Presidio employees, visitors, and other interested parties.</p>	Post-Construction	Trust	Climate Friendly Parks Program / Implementation of Environmental Management Systems to Measure Performance / Documentation in Action Plan	Final SEIS Section 3.4  California Air Resources Board (CARB) Climate Change Proposed Scoping Plan
<b>NOISE</b>				
<p><b>NR-8 <i>Natural Sounds</i></b> Seasonally restrict special events or other activities that could disturb nesting birds at sensitive use areas.</p>	Post-Construction	Trust	Incorporation of Measure into Special Use Permit	Final SEIS Section 3.5
<p><b>NR-23 <i>General Construction/Demolition Noise</i></b> Comply with Trust-enforced noise criteria, standards, and levels to minimize noise disturbance in the vicinity of project sites.</p>	Construction	Trust/Contractors	Building Permit Condition	Final SEIS Section 3.5  San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code)

<i>Mitigation Measure</i>	<i>Implementation Timing</i>	<i>Person/Party Responsible</i>	<i>Compliance Verification Mechanism</i>	<i>Reference</i>
NR-24 <i>Traffic Noise Reduction</i> Encourage city agencies and transit providers to select and use transit vehicles that produce less noise pollution. Promote use of energy-conserving government vehicles by maintenance and other divisions. If possible, use electric or other alternative vehicles to reduce noise levels.	Post-Construction	Trust/Muni/GGBTHD	Transit Operations Plan and Budget	Final SEIS Section 3.5
NR-25 <i>Traffic Noise Monitoring and Attenuation</i> Monitor San Francisco National Cemetery, Crissy Field marsh, and Tennessee Hollow during construction or other activities that could be detrimental to their natural soundscapes, both for recreation and wildlife. Institute noise attenuation measures, if feasible, if noise levels exceed applicable Federal Highway Administration (FHWA) standards. Examples of attenuation measures include sound barriers or berms, vehicle restrictions, and traffic calming.	Construction	Trust/Contractors	Incorporation of Measure into Contract Specifications	Final SEIS Section 3.5 FHWA Noise Abatement Criteria
<b>HISTORIC RESOURCES</b>				
CR-1 <i>Documentation of Buildings to be Relocated or Removed</i> Before historic buildings or additions to historic buildings are relocated or removed, determine appropriate mitigating measures in consultation with the California State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation. Include measures such as recordation according to the Historic American Building Survey Standards, salvage, preservation, and curation of historic building fabric as warranted.	Pre-Construction	Trust	Project Documentation under Section 106 Consultation and the PA-MPU	Final SEIS Section 3.6 PA-MPU
CR-2 <i>Code Compliance</i> Require tenants that rehabilitate historic buildings to meet life safety standards, comply with applicable accessibility laws and regulations, and meet applicable building codes to the extent practicable.	Pre-Construction and Construction	Trust	Building Permit Condition	Final SEIS Section 3.6
CR-3 <i>Long-Term Maintenance &amp; Preservation of Vacant Buildings</i> Following rehabilitation of historic buildings, ensure that tenants perform continued maintenance, thereby preventing damage to historic features and ensuring that buildings are adequately maintained. Implement a preservation and maintenance program for unoccupied buildings, including regular inspections, necessary stabilization work to ensure long-term preservation and safe conditions for park visitors, monitoring of the condition of vacant buildings, and prioritization of stabilization and rehabilitation needs to ensure the maximum feasible preservation and protection of park resources.	Pre-Construction and Construction	Trust	Lease Provision Requirement/ Trust Capital Plan	Final SEIS Section 3.6
CR-6 <i>Monitor Visitor Impacts on Sensitive Resources</i> Monitor sensitive cultural resources, such as historic landscape features and vacant structures, and prioritize actions to reduce any adverse impacts on these resources caused by park visitors and new uses. Potential remedies may include temporary closure of areas, protective barriers, and informational signs.	Post-Construction	Trust	Incorporation of Measure into Trust Work Programming Process	Final SEIS Section 3.6

<i>Mitigation Measure</i>	<i>Implementation Timing</i>	<i>Person/Party Responsible</i>	<i>Compliance Verification Mechanism</i>	<i>Reference</i>
<b>CR-7 Compliance with Standards for Building and Cultural Landscape Rehabilitation</b> Ensure that building rehabilitation projects conform with the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco. If new uses are proposed for historic buildings, ensure that required building modifications conform to the Secretary of the Interior’s Standards for the Rehabilitation of Historic Properties. Ensure that historic landscape rehabilitation projects conform to the Secretary of the Interior’s Guidelines for the Treatment of Cultural Landscapes.	Design and Pre-Construction	Trust	Project Documentation under Section 106 Consultation and the PA-MPU	Final SEIS Section 3.6 PA-MPU
<b>CR-8 Ongoing Identification of Historic Properties</b> Continue to evaluate for possible inclusion in the list of contributing resources those buildings or structures that may become 50 years old or may have achieved exceptional significance since the 1993 update was completed. Evaluations to also encompass archaeological discoveries.	Post-Construction	Trust	Project Documentation under Section 106 Consultation and the PA-MPU	Final SEIS Section 3.6 PA-MPU
<b>CR-9 Stipulations and Mitigations Resulting from the Section 106 Consultation</b> Incorporate in the implementation of SEIS proposals any avoidance, minimization, or mitigation measures that have been stipulated in the PA-MPU, including additional consultation, design reviews, and the preparation of supplementary documentation (such as historic structures reports [HSRs] or a Cultural Landscape Report).	Design, Pre-Construction, and Post-Construction	Trust	Project Documentation under Section 106 Consultation and the PA-MPU	Final SEIS Section 3.6 PA-MPU

**ARCHAEOLOGY**

<b>AR-1 Avoidance and Minimization</b> Take all reasonable measures to protect archaeological sites and features identified inside the National Historic Landmark District (NHLD). Prepare an Archaeological Management Assessment (AMA) for individual construction projects or groups of related projects prior to the completion of schematic design. Avoidance and minimization of adverse effects through the continuing design phases is the preferred outcome. Avoid and/or minimize to the extent possible direct effects on archaeological resources that contribute to the NHLD or are eligible for the National Register of Historic Places (NRHP) through negotiation with project proponents, the Trust’s Federal Preservation Officer, and the Trust’s Principal Archaeologist. Outline a course of action for the projects where significant archaeological sites could not be avoided consistent with the stipulations of the PA-MPU.	Design and Pre-Construction	Trust	Archaeological Management Assessment	Final SEIS Section 3.7 PA-MPU
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<i>Mitigation Measure</i>	<i>Implementation Timing</i>	<i>Person/Party Responsible</i>	<i>Compliance Verification Mechanism</i>	<i>Reference</i>
<b>AR-2 Archaeological Identification Plan(s)</b> Develop a project-specific plan at the completion of the schematic phase for projects anticipated to have an adverse effect but that require further identification to understand the content and dimensions of the features, to assess the nature and extent of the effect, and/or to guide continuing efforts to avoid or minimize the adverse effect. For archaeological features identified, the Trust may assume eligibility. Identification may further refine recommendations in the AMA and lead to a monitoring or treatment plan.	Design and Pre-Construction	Trust	Archaeological Identification Plan	Final SEIS Section 3.7 PA-MPU
<b>AR-3 Archaeological Monitoring Plan(s)</b> Develop a project-specific plan for those projects that are not anticipated to have an adverse effect, or that have been designed to avoid adverse effect during design development but that nonetheless are within proximity to identified or predicted archaeological features. Describe measures to protect archaeological features, including the proposed location and frequency of monitoring along with required documentation procedures. Ensure that measures to identify, assess, and determine the appropriate treatment of archeological features should they be encountered during monitoring are consistent with the discovery protocols, below.	Design and Pre-Construction	Trust	Archaeological Monitoring Plan	Final SEIS Section 3.7 PA-MPU
<b>AR-4 Archaeological Research Design</b> If archaeological resources cannot be avoided, review the Archaeological Research Design for El Presidio and the Main Post (Revelar) to assess its completeness and appropriateness before proceeding with other mitigation measures, such as data recovery, for specific projects. Add site-specific information and detail as needed. If it is determined that a project will likely disturb prehistoric sites, draft another research design for those resources.	Design, Pre-Construction, and Post-Construction	Trust	Archaeological Research Design	Final SEIS Section 3.7 PA-MPU
<b>AR-5 Archaeological Treatment Plan(s) and Data Recovery</b> If an archaeological site or feature cannot be avoided and preserved in place during construction, develop and implement a treatment plan including data recovery in order to preserve important information that would otherwise be lost. Develop a project-specific plan for those projects that have unavoidable adverse effects and where existing identification is sufficient to proceed to treatment, or for which further identification is incorporated within the treatment plan. Describe protection measures for unaffected archaeological features, methods for data recovery, relevant research questions to be answered, monitoring during construction, responsibilities and coordination, curation, and the interpretation of recovered information in a manner that it is understandable and accessible to the public.	Post-Construction	Trust	Archaeological Treatment Plan	Final SEIS Section 3.7 PA-MPU

<i>Mitigation Measure</i>	<i>Implementation Timing</i>	<i>Person/Party Responsible</i>	<i>Compliance Verification Mechanism</i>	<i>Reference</i>
<p><b>AR-7 Archaeological Discovery Protocol</b> Develop a standard response protocol for all projects in the event of a discovery. Should circumstances arise where the Trust cannot address discoveries in a manner consistent with the protocol, notify the SHPO of the discovery and any project-related time constraints, then agree upon reasonable time frames for consultation. Take into account any timely comments prior to making a final decision on treatment. Describe the Trust’s methods to comply with the Archaeological Resources Protection Act and Native American Graves Protection and Repatriation Act in the protocol.</p>	Within 30 Days of the Execution of the PA-MPU	Trust	Archaeological Discovery Protocol	Final SEIS Section 3.7 PA-MPU
<p><b>AR-8 Curation of Archaeological Collections</b> Access, catalogue, and manage all records associated with excavations and all excavated materials not subject to the Native American Graves Protection and Repatriation Act (NAGPRA) that are deemed important for preservation.</p>	Post-Construction	Trust	Applicable Field and Laboratory Manuals for the Undertakings	Final SEIS Section 3.7 PA-MPU 36 CFR Part 79, Curation of Federally-Owned and Administered Collections
<b>VISUAL RESOURCES</b>				
<p><b>VR-1 Height Limits on New Construction</b> Establish height limits on new construction to avoid blocking of internal Main Post views.</p>	Design	Trust	Design Guidelines	Final SEIS Section 3.8
<b>VISITATION</b>				
<p><b>CO-4 Limitations of Visitor Opportunities</b> Limit visitor opportunities to those that are suited and appropriate to the significant natural, historic, scenic, cultural, and recreational resources of the Presidio. Allow only those visitor activities that are consistent with the Trust Act and appropriate to the purpose for which the park was established. Encourage tenants to provide activities consistent with these requirements.</p>	Pre-Design	Trust	Project Documentation prior to Execution of Lease Agreement or Project Approval	Final SEIS Section 3.9
<p><b>CO-5 Prohibitions on Visitor Uses</b> Prohibit visitor uses that would impair park resources or values, or interfere with interpretive activities or other existing, appropriate park uses.</p>	Pre-Design	Trust	Project Documentation prior to Execution of Lease Agreement or Project Approval	Final SEIS Section 3.9

<i>Mitigation Measure</i>	<i>Implementation Timing</i>	<i>Person/Party Responsible</i>	<i>Compliance Verification Mechanism</i>	<i>Reference</i>
<b>CO-6 Management Controls</b> Impose management controls on visitor uses, if necessary, to ensure that the Presidio's resources are protected. If an ongoing or proposed activity would cause unacceptable impacts to park resources, make adjustments to the way the activity is conducted, including placing limitations on the activity, so as to eliminate the unacceptable impacts. Base any restrictions on professional judgment, law and policy, the best available scientific study or research, appropriate environmental review, and other available data. As visitor use changes over time, decide if management actions are needed to keep use at acceptable and sustainable levels.	Post-Construction	Trust	Project Documentation following Execution of Lease Agreement or Project Approval	Final SEIS Section 3.9
<b>CO-7 Special Events</b> Impose appropriate permit conditions for special events to ensure that park resources are protected.	Post-Construction	Trust	Incorporation of Conditions into Special Use Permit	Final SEIS Section 3.9
<b>CO-8 Monitoring of Visitor Levels</b> Monitor visitation levels to ensure that park uses do not unacceptably affect Presidio resources. Identify visitor carrying capacities for managing visitor use if necessary.	Post-Construction	Trust	Trust Work Programming Process	Final SEIS Section 3.9
<b>RECREATION</b>				
<b>CO-10 Relocation or Replacement of Recreational Facilities</b> Should any recreational facilities need to be relocated in conjunction with other planning objectives, pursue relocation or replacement during project-specific analyses.	Design	Trust	Project Documentation prior to Execution of Lease Agreement or Project Approval	Final SEIS Section 3.10
<b>WATER RESOURCES</b>				
<b>NR-15 Stormwater Pollution Prevention</b> Provide temporary measures to control sediment and other pollutants.	Construction and Post-Construction	Trust/Contractor	Stormwater Pollution Prevention Plan	Final SEIS Section 3.11
<b>NR 16/19 Stormwater Control</b> Minimize site imperviousness, control pollutant sources, and incorporate treatment and flow-control facilities that retain, detain, or treat runoff. Meet the requirements of the National Pollution Discharge Elimination (NPDES) Phase II permit for Post-Construction Runoff Control and incorporate as appropriate post-construction Best Management Practices (BMPs) including but not limited to those in Appendix C of the final SEIS.	Post-Construction	Trust/Project Civil Engineer	Stormwater Control Plan	Final SEIS Section 3.11 Stormwater Phase II Final Rule Final SEIS Appendix C
<b>UT-6 Stormwater Drainage System Upgrades</b> Make necessary infrastructure upgrades to the stormwater drainage system to ensure that adequate system capacity is provided and also to correct existing operational problems.	Pre-Construction	Trust	Lease Provision Requirement/ Trust Capital Plan	Final SEIS Section 3.11

<i>Mitigation Measure</i>	<i>Implementation Timing</i>	<i>Person/Party Responsible</i>	<i>Compliance Verification Mechanism</i>	<i>Reference</i>
<p>NR-26 <i>Groundwater Discharge</i> If dewatering is necessary during construction, retain pumped groundwater in a holding tank to allow suspended particles to settle and testing as required prior to discharging to either the sewer system or storm drain system. If additional treatment is required, follow the recommendations of the geotechnical engineer or environmental remediation consultant, in consultation with the Trust and in compliance with appropriate standards regarding treatment of pumped groundwater, prior the discharge to either the sewer system or storm drain system. Prior to discharging to the storm drain system, determine whether a permit from the Regional Water Quality Control Board (RWQCB) under a general NPDES dewatering permit is required.</p>	Construction	Trust/Contractors	Incorporation of Measure into Contract Specifications/ RWQCB Dewatering Permit	Final SEIS Section 3.11

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# Attachment B Response to Comments on Final SEIS

## LIST OF COMMENTS

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1	The Trust Should Comply with the “One Down/One Up” Restriction on New Construction	B-1
2	The Shift to Public-Serving Uses Would Affect the Overall Financial Management Plan of the Presidio	B-1
3	The Need for a New Athletic Field Should be Stated in the Purpose and Need	B-3
4	The No Action Alternative in the Draft SEIS and the Final SEIS Should be the Same	B-3
5	The Role and Function of the Heritage Center and the Visitor Center Should be Clarified	B-4
6	The Trust Should Rehabilitate Existing Buildings at the Main Post Rather Than Construct New Ones	B-5
7	More Information on the Magnitude of Impacts Should be Provided	B-5
8	How Proposed Changes in Use Affect Presidio-Wide Housing Goals Should be Clarified	B-6
9	Where Existing Residential Use Occurs at the Main Post Should be Clarified	B-6
10	How the Lodge Would Affect the Total Presidio-Wide Lodging Units Should be Clarified	B-6
11	Demolition of Herbst Hall Should be Postponed Until There is a Demonstrated Need for Additional Parking on Moraga Street	B-6
12	The Trust Should Commit to Constructing Underground Parking at the Bluff	B-7
13	The Same Range of TDM Measures Should be Applied to All Alternatives	B-8
14	The Relationship Between Increased Traffic at Main Post Intersections and Identified Mitigation Measures Should be Clarified	B-8
15	A Proposed Construction Schedule or Phasing Strategy Should be Provided	B-9
16	The Adverse Effect from Demolition of Building 46 Should be Identified	B-9
17	Relocating Buildings 40 and 41 Should Not be Considered a Less-Than-Significant Impact	B-10
18	Definitions Should be Provided for the Analysis of Cumulative Impacts on Historic Resources	B-11
19	Removal of Buildings 40 and 41 Would Not Enhance the Character of the Open Space in the <i>Plaza de Armas</i> of El Presidio	B-11
20	Archaeology Plans Should be Finalized Before the Trust Moves Forward with El Presidio Plans	B-12
21	The Analysis of the Visual Impact of the Office Building Under Alternative 1 Should be Completed	B-12
22	The Analysis of the Visual Impact of the Presidio Theatre Addition Should be Reconsidered	B-12

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| 23 | The Analysis of the Visual Impact of the Presidio Chapel Addition Should be Reconsidered   | B-13 |
| 24 | The Analysis of the Impacts on Views of the Parade Grounds Should be Reconsidered  | B-13 |
| 25 | The Loss of Bowling Should be Discussed in the Cumulative Impact Analysis  | B-14 |
| 26 | More Information on the Existing Wetland Near the Proposed Athletic Field Should be Provided   | B-15 |
| 27 | Proposed Stormwater Best Management Practices (BMPs) Should be Discussed with the NPS  | B-15 |
| 28 | The Trust Should Only Proceed with the Heritage Center, Interpretive Signage, and Interpretive Programming in Area B Following Consultation with and the Approval of the NPS | B-15 |

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# Attachment B Response to Comments on the Final SEIS

This attachment provides responses to the key issues and concerns raised during the wait period between circulation of the final SEIS for the Main Post Update and the Presidio Trust Board of Directors' decision to adopt the Main Post Update.

## PRESIDIO TRUST ACT

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### 1 The Trust Should Comply with the "One Down/One Up" Restriction on New Construction

The Trust Act's legislative limitation on new construction, which the Main Post Update may exceed, helps preserve the natural, historic, and open space values of the Presidio. The Trust should address this limitation and provide the specific information necessary to satisfy its requirements.

**Response** See the response to Comment 35: The Preferred Alternative Involves More Construction Than Is Authorized in the Presidio Trust Act, on pages 37 and 38 in the Response to Comments volume of the final SEIS.

## ECONOMIC CONSIDERATIONS

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### 2 The Shift to Public-Serving Uses Would Affect the Overall Financial Management Plan of the Presidio

Because a financial analysis of the Main Post Update is not provided, it is unclear how the Main Post Update contributes to the overall financial success of the Trust. If any square footage reductions at the Main Post would necessitate new land uses in other planning districts in the future in order to achieve financial goals, the land use shift should be disclosed.

**Response** Although the financial performance of a project is not a NEPA consideration, the Trust nonetheless appreciates the commentor's concern for the financial security of Area B of the Presidio. In order to demonstrate that the Presidio's positive financial outlook is not materially affected by the Main Post Update (the selected alternative), the Trust is providing an analysis of the potential impact of the Main Post Update on park management and operations. The financial analysis provided in the 2002 PTMP EIS has been updated to reflect 1) expenses associated with the building-related capital projects (including demolition) needed to build out the Main Post under the selected alternative, and 2) the relative revenue-generating capacity of the alternative.

Applying the threshold used in the final PTMP EIS, the Main Post Update would be considered to have a financial impact if it materially affected the Trust's ability to achieve financial sustainability as mandated by the Trust Act Public Law 104-333. The results of the updated financial analysis, shown in Table 1, illustrate that is not the case.

The updated financial analysis estimates that the total cost of building-related capital projects (including demolition) needed to build out the Main Post Update would be approximately \$216.1 million, compared to \$245.1 million to build out the Main Post under the PTMP. The decrease in building-related capital

costs of \$29.0 million would be due mainly to reduced building space under the Main Post Update. The \$29.0-million decrease would reduce park-wide costs (estimated at \$700.0 million under the PTMP) by 4.1 percent.

The proposed reduction in office and residential square footage and increase in square footage allocated to cultural, educational, and public-serving uses under the Main Post Update would potentially decrease revenues by \$2.3 million annually. This decrease would represent 2.6 percent of the estimated \$87.2 million in park-wide revenue in 2030. This is considered a modest loss, and well within the margin for error for this type of financial analysis, taking into account financial uncertainties and changing market conditions. Thus, the decrease in building space and changes in building uses contemplated under the Main Post Update would not affect the park's long-term financial future. A discussion of the potential impact of the Main Post Update on park management and operations incorporating the financial analysis prepared in response to this comment has been added to Section 3.13 Other Impacts (under Non-Significant Impacts) in the final SEIS. See errata in Attachment C.

## 1 SUMMARY OF MAIN POST CAPITAL COSTS AND REVENUES

	<i>Main Post</i>			<i>Park-Wide (2030)</i>	<i>Main Post Change as Percent of Park-Wide Total</i>
	<i>2002 PTMP</i>	<i>2010 Update</i>	<i>Change</i>		
<b>BUILDING-RELATED CAPITAL COSTS<sup>a</sup></b>					
Office Uses	130.5	79.1	(51.4)	–	–
Public-Serving Uses	62.8	95.2	32.3	–	–
Residential Uses	50.5	36.1	(14.4)	–	–
Demolition	1.2	5.6	4.4	–	–
<b>Total</b>	<b>245.1</b>	<b>216.1</b>	<b>(29.0)</b>	<b>700.0</b>	<b>(4.1%)</b>
<b>ANNUAL RESIDENTIAL AND COMMERCIAL BUILDING REVENUES<sup>a</sup></b>					
Office Uses	10.6	6.6	(4.0)	–	–
Public-Serving Uses	5.4	8.4	3.0	–	–
Residential Uses	4.9	3.5	(1.4)	–	–
<b>Total</b>	<b>20.9</b>	<b>18.6</b>	<b>(2.3)</b>	<b>87.2</b>	<b>(2.6%)</b>

<sup>a</sup> Dollars noted in millions (constant Fiscal Year 2011 dollars).

Notes: Figures may not add due to rounding. See Tables 2, 3, and 4 on pages 18 and 19 of the Main Post Update for square footage estimates used to prepare the updated financial analysis.

## PURPOSE AND NEED

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### 3 The Need for a New Athletic Field Should be Stated in the Purpose and Need

The Purpose and Need section of the final SEIS is very clear. However, the need for the athletic field should be stated. Also, additional analysis of the impacts associated with the field's construction and operation should be provided.

**Response** In the PTMP, the Trust commits not only to continue the longstanding tradition of active play at the Presidio, but also to expand the diversity and quality of recreational opportunities for the public. The PTMP envisioned that some of the Presidio's fields would be removed or relocated in order to achieve other goals, such as restoration of Tennessee Hollow. The PTMP did not specifically identify the location of new (or relocated) playing fields, but rather deferred such analysis to a future date. Following a series of public workshops on the subject conducted in the fall and winter of 2006-2007, the Trust prepared a draft staff report<sup>1</sup> that identified the "Child Care Center" site at the Main Post as one of 11 sites in the park that met the functional requirements for a playing field. The Main Post Update incorporates by reference the findings of the draft staff report. In response to the comment, the following sentence has been added to the Purpose and Need section of the final SEIS after the last full sentence at the bottom of page 4 (see errata in Attachment C):

*A new athletic field will allow opportunities for active recreation, both for the Presidio's growing community and for the general public. This is especially important given the constraints surrounding other areas of the park and the removal or relocation of existing fields for Tennessee Hollow restoration.*

The draft staff report summarizes factors used in assessing locations, including possible improvements, potential issues of concern and constraints, and timing considerations, but indicates that all improvement projects will require further design and environmental review. No additional specific planning for an athletic field at the "Child Care Center" site has been undertaken as of yet. Additional NEPA environmental review will be conducted at a later date before a design is completed and final decisions regarding the use of the site for an athletic field are made.

## ALTERNATIVES

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### 4 The No Action Alternative in the Draft SEIS and the Final SEIS Should be the Same

Changes have been made to the no action alternative in the final SEIS.

**Response** The differences between the no action alternative in the draft SEIS and the final SEIS are minor and are due to corrections made based upon more current information on the projects underway or proposed for implementation under the PTMP, the currently approved plan for the Main Post.

<sup>1</sup> See *Presidio Playing Fields – Location Assessment* available at <http://www.presidio.gov/NR/rdonlyres/7920AE30-9140-4899-AC88-F44410718827/0/PlayingFieldsStaffReport.pdf>.

## 5 The Role and Function of the Heritage Center and the Visitor Center Should be Clarified

The fact that there is no mention of an NPS Visitor Center under the preferred alternative is of concern. In addition, the proposed Heritage Center's purpose is varyingly described, and in some instances is indistinguishable from the Visitor Center. Use of Building 102 as the Visitor Center should be confirmed, and the Trust's legislation with regard to Building 102 should be referenced. Also, the planning effort underway for the collaborative Visitor Center should be described. Finally, the Trust should commit to clarifying the programmatic relationship between the Heritage Center and the Visitor Center.

**Response** Although the Trust Act identifies Building 102 as the location of the NPS William Penn Mott Jr. Visitor Center, Building 102 has been vacant for nearly a decade. At this time there are no known plans for the building's reuse. Until recently, the NPS Visitor Center had been housed in the Officers' Club (Building 50). The SEIS does include analysis of a Visitor Center in the Officers' Club (Building 50) in Alternatives 1, 3, and 4, but not in the selected alternative, Alternative 2, because the Trust proposes to locate a Heritage Center in the Officers' Club. A Visitor Center in an existing building, such as Building 102, would not require additional analysis in the selected alternative because this use would be consistent with the preferred uses identified for the Main Post. A traditional History Center/Visitor Center is analyzed as new construction in Alternative 3 because that alternative analyzes the proposal from the Presidio Historical Association.

The Trust agrees that the Presidio should have a Visitor Center and is collaborating with the NPS and the Golden Gate National Parks Conservancy to develop one in the Main Post. This effort is acknowledged on page 23 in the Main Post Update, "Collaborate with the National Park Service to develop a Visitor Center and create interpretive functions" is listed as a key project. A number of sites for a permanent Visitor Center would be considered, including Building 102. Should the Visitor Center ultimately be located in Building 102, it would be consistent with the visitor-serving uses identified as a preference for the Montgomery Street Barracks and therefore would not require additional analysis. If another location is chosen that requires additional NEPA analysis, that analysis would supplement the final SEIS for the Main Post Update.

The Heritage Center is described in different ways for different alternatives because in fact different projects are analyzed, including a more traditional History Center/Visitor Center (Alternative 3). The selected alternative identifies the Officers' Club as the location for the Heritage Center because the building itself illustrates the many layers of Presidio history and it is a visitor destination. In addition to permanent and changing interpretive exhibits, the Heritage Center would host history-related programming, including programming that is part of the Archaeology Lab. But the Heritage Center as envisioned and described in the selected alternative is not the same as a Visitor Center, which is expected to offer broader informational and orientation services and function as a portal to the park as a whole, including its recreational and natural resources, attractions, and amenities.

Given the complex stories of the Presidio, its significant amount developed space, and its urban location, the Presidio, unlike a more traditional national park, can support an array of centers of engagement, each with a specific focus on a particular facet of the Presidio. The programmatic relationship between the Visitor Center and the Heritage Center would be clarified as the two facilities are developed, but it is

reasonable to assume that the relationship would be similar to that between a Visitor Center and other centers of engagement, such as the Stewardship Center or the Crissy Field Center.

#### 6 The Trust Should Rehabilitate Existing Buildings at the Main Post Rather Than Construct New Ones

A new lodge at the Main Post is not the only means to welcome visitors and animate the Main Parade. There are other ways to achieve this goal such as rehabilitating buildings, which should be a top priority.

**Response** The Trust has rehabilitated more than 300 historic buildings throughout the Presidio, including nearly 75 percent of the buildings in the Main Post, and rehabilitating the remaining historic buildings in the Presidio is an ongoing priority for the Trust. The PTMP provided for new construction on the Main Post, but identified it for office space. The Trust would prefer to use that new construction to support visitation to the Presidio. Furthermore, lodging would have fewer environmental impacts than office use, while bringing a more public character to the Main Post. Although it is true that a new lodge is not the only way to welcome the public and animate the Main Post, it is nonetheless a traditional use at a national park site and it is an expected amenity. Developing lodging on the Main Post would not inhibit the reuse of the remaining buildings, and may in fact help bring more public uses to those buildings.

### ENVIRONMENTAL IMPACTS – GENERAL

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#### 7 More Information on the Magnitude of Impacts Should be Provided

A quantitative assessment of the magnitude of the effects of the alternatives should be provided.

**Response** Appropriate methods of analysis were used to prepare the SEIS. While the Council on Environmental Quality NEPA Regulations do not mandate quantitative analysis, numerical measurements were used where appropriate to highlight the differences in impacts among the various alternatives. For resources of concern identified in Section 3 of the final SEIS, specific thresholds<sup>2</sup> were provided to determine if impacts of the project would be significant and if the resource would be degraded to unacceptable levels. Thresholds were largely derived from those used in the final PTMP EIS. Where adequate data and analytical procedures were available, the thresholds were represented by measurements that identified changes to existing conditions in meaningful units. For many of the resource topics, the thresholds were set as specific numerical standards (e.g., level of service to assess transportation impacts at unsignalized intersections [see final SEIS page 77], emissions from vehicle trips and area sources to assess air quality impacts [see final SEIS page 101], greenhouse gas emissions to assess global climate change [see final SEIS page 102], noise levels from traffic volumes to determine noticeable noise increases [see final SEIS page 110], and increases in impervious surfaces to address impacts on water quality and storm drainage [see final SEIS pages 198 and 199]). Other resource topics applied qualitative standards that determined the potential for incompatible uses (see final SEIS page 45), adverse effects on the NHLD (consistent with 36 CFR 800.5 Assessment of Adverse Effects as discussed on final SEIS page 128), and visual impacts (by applying specific criteria provided on page 162). For the remaining resource topics, the discussions of methodology described how the resource would or would not be affected and how that determination was made.

<sup>2</sup> A threshold is the line above which an impact is considered significant and below which it is not.

The impacts of the action alternatives were compared to the no action alternative (Alternative 1) and such descriptors as “more than” or “less than” were used to help draw conclusions about the magnitude and significance of environmental impacts. The use of NPS-suggested descriptors such as “major,” “moderate,” and “minor” is not standard practice in NEPA impact analysis and is based on the guidance the NPS has developed for its own NEPA documents. This guidance does not apply to Trust environmental impact statements or projects within Area B.

## LAND USE

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### 8 How Proposed Changes in Use Affect Presidio-Wide Housing Goals Should be Clarified

Proposed office use for the upper floors of the Montgomery Street Barracks would replace residential use, and would reduce the overall housing supply.

**Response** See the response to Comment 20: The Number of Housing Units Is Unclear, on page 21 in the Response to Comments volume of the final SEIS.

### 9 Where Existing Residential Use Occurs at the Main Post Should be Clarified

**Response** See Figure 13, Existing Building Use, on page 43 of the final SEIS for the location of existing residences at the Main Post.

### 10 How the Lodge Would Affect the Total Presidio-Wide Lodging Units Should be Clarified

**Response** The PTMP estimated lodging at 200,000 to 260,000 square feet (180 to 250 rooms) park-wide, with 51,000 square feet of lodging on the Main Post. The Main Post Update provides for an estimated 90,000 square feet (130 rooms) of lodging including lodging in historic Pershing Hall as well as in new construction along Graham Street. Unlike the “building cap” imposed by the Trust Act or the maximum allowable building space established for each planning district within the PTMP, the PTMP lodging estimates should not be construed as overall limitations on total square footage or numbers of rooms park-wide devoted to lodging. This increase in lodging at the Main Post is consistent with the Trust goals as stated in the PTMP to provide lodging as part of the visitor experience, and to provide an opportunity to stay overnight in an historic building if Buildings 85, 86, and 87 are included as part of the project (see page 41 of the PTMP).

## TRANSPORTATION AND PARKING

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### 11 Demolition of Herbst Hall Should be Postponed Until There is a Demonstrated Need for Additional Parking on Moraga Street

Development of the Moraga Avenue parking lot at Herbst Hall should be deferred because it would not be needed at least for the next three years, would pose safety concerns at the Presidio Child Development Center (CDC), would increase unwanted traffic along Montgomery Street, and would cost \$4 million.

**Response** All of the historic Montgomery Street Barracks and the Presidio Theatre would be occupied eventually. Rehabilitation of the barracks buildings is underway and the buildings will be ready for occupancy next year. It is unreasonable to wait until rehabilitated buildings are occupied before beginning construction of a parking lot expected to serve them. Furthermore, the geographic location of this parking

lot is important for all buildings in the southern area of the Main Post. It would also serve the Archaeology Lab, Officers' Club, and Heritage Center.

The Trust expects transportation demand management (TDM) efforts will continue to successfully encourage PresidiGo ridership and carpooling as alternative modes to single-occupant automobile use and will consequently minimize parking demand throughout the Main Post. However, a parking lot will be needed in the southern area of the Main Post regardless of the efficacy of TDM efforts in managing overall district-wide demand. The geographic location of the Moraga lot will serve the nearby barracks buildings and theater in the near term and allow for the removal of parking from El Presidio in the long term. The Trust also believes that by accommodating parking demand of some of the barracks buildings, the Moraga lot would be one of the factors that may allow for the construction of fewer, if any, underground spaces at the north bluff.

The Trust has considered the needs of the Presidio CDC in its plans for the Moraga lot. In the design of the expanded parking lot, the Trust will add a curbside pick-up/drop-off zone for buses near the front door to the Presidio CDC. In addition, this lot will include several short-term parking spaces immediately adjacent to the Presidio CDC. These short-term spaces will serve parents and caregivers who need to park briefly while they are picking up or dropping off children.

Pedestrian access to historic buildings on Montgomery Street is not currently problematic, nor is it expected to be in the future. The Main Parade project will define pedestrian paths across the Main Parade and therefore define pedestrian crossings of Montgomery Street. In addition, the sidewalk in front of the Montgomery Street Barracks is wide and set back from the street. Given these conditions, any increase in vehicular traffic on Montgomery Street is not anticipated to affect pedestrian access or safety. Furthermore, not all motorists traveling to and from the Moraga lot would use Montgomery Street; many would use Moraga Avenue when traveling to and from the Arguello Gate, Lombard Gate, or Presidio Boulevard Gate.

## 12 The Trust Should Commit to Constructing Underground Parking at the Bluff

The Trust states that it would consider alternative means to accommodate parking demand before building additional underground parking. The impact and resulting mitigation measures of not constructing the 300 underground spaces should be identified.

**Response** It would be remiss for the Trust to commit to building an underground parking structure that is not needed to meet average peak-period parking demand. If the Trust does not build underground parking at the Main Post bluff, it will be because parking demand is adequately met by the parking supplied by surface parking lots and on-street parking. The Trust is in the process of implementing parking fees on the Main Post, but parking fees are not yet applied throughout the district. Until paid parking is fully implemented throughout the district, it will not be possible to accurately predict the actual effect of TDM efforts on parking demand. Over the past few years, the Trust has monitored actual parking demand on the Main Post and compared it to the calculated parking demand for the occupied buildings at that time. The findings suggest that actual parking demand is slightly less than estimated or calculated demand, and that an underground parking structure at the Main Post bluff may not be necessary. The Trust will

continue to monitor actual parking demand as paid parking is implemented throughout the Main Post and will revise projected needs accordingly.

As made clear in the final SEIS, if and when it is determined that an underground parking structure at the Main Post bluff is needed to accommodate demand, the Trust will do more detailed NEPA analysis to evaluate the site-specific environmental impacts of the structure.

### 13 The Same Range of TDM Measures Should be Applied to All Alternatives

The preferred alternative should not show a greater degree of effectiveness for Transportation Demand Management (TDM) measures than other alternatives.

**Response** The impact of varying levels of TDM effectiveness was previously incorporated into the parking analysis in response to public comment. In response to this comment, relevant discussions in the final SEIS have been changed to reflect a consistent 10-percent reduction in parking demand for all alternatives to allow for the requested comparison among alternatives. See revisions in Attachment C.

### 14 The Relationship Between Increased Traffic at Main Post Intersections and Identified Mitigation Measures Should be Clarified

It is not clear what would trigger the need to install traffic signals at the Main Post. Assurances that TDM measures would succeed in avoiding the need for signalization should be provided.

**Response** Two intersections on the Main Post may operate at Level of Service (LOS) E or F and have therefore been identified for mitigation: the Lincoln/Graham intersection (under Alternative 3 only and in the AM peak hour only), and the Lincoln/Halleck intersection (under all alternatives in both the AM peak hour and PM peak hour). Signalization has been identified as the mitigation measure for both intersections, but would be considered as a last resort after more intensive TDM measures are applied. TDM measures (e.g., more frequent PresidiGo service, increased parking fees) can be adjusted as necessary to yield a greater reduction in traffic volumes.

The Lincoln/Graham intersection is currently stop-controlled on all four approaches with left-turn pockets on both Lincoln Boulevard approaches. This intersection is projected to operate at LOS E under Alternative 3 only and in the AM peak hour only. It is expected to operate at LOS D or better under all other alternatives. Under Alternative 3 in the AM peak hour, a relatively small reduction (less than 5 percent) in traffic through this intersection would improve the operation of the intersection to LOS D or better. This intersection is expected to operate at a poor level of service under Alternative 3 because the alternative would eliminate vehicular traffic on roadways within El Presidio, which would concentrate more traffic on Graham Street. Allowing vehicular traffic on roadways within El Presidio would also improve the operation of the intersection to LOS D or better. Since the Lincoln/Graham intersection is not expected to operate at LOS E or F under the Trust's selected alternative, and because a relatively small reduction in volume would yield LOS D or better, it is unlikely that the Lincoln/Graham intersection would be signalized.

The Lincoln/Halleck intersection was not projected to operate poorly in the final PTMP EIS because Lincoln Boulevard was evaluated with two vehicular lanes in each direction. Since then, Lincoln Boulevard has been restriped so that it has one vehicle through lane in each direction, a center lane for left-

turn pockets, and bike lanes in each direction. Although the provision of bike lanes reduces the capacity for vehicular traffic through the intersection, the benefit of the bike lanes in vehicle-trip reduction efforts is more important. The Lincoln/Halleck intersection is a T intersection and is currently stop-controlled on only the minor approach; it has a short channelized right-turn pocket on the Halleck Street approach and a left-turn pocket on Lincoln Boulevard. Converting two-way or one-way stop-controlled intersections to all-way stop control typically increases the capacity of an intersection, although to a lesser degree than signalization. Adding stop control to the Lincoln Boulevard approaches to this intersection would lessen the delay and therefore improve the level of service for the Halleck Street approach. Under the conditions with the worst delay, however, adding this stop control would not improve operations to LOS D or better. Although adding the stop control would increase delay for the Lincoln Boulevard approaches, the average level of service for the intersection would be an improvement from the LOS F projected for the Halleck Street approach under one-way stop-control. An approximate 20-percent reduction in future projected traffic volume through the intersection combined with all-way traffic control would allow the intersection to operate at LOS D or better while maintaining the bike lanes on Lincoln Boulevard.

#### **15 A Proposed Construction Schedule or Phasing Strategy Should be Provided**

Updated construction assumptions should incorporate any findings from the accelerated Doyle Drive reconstruction project, which has altered traffic patterns within the Presidio and affected congestion on Doyle Drive and the exit/entrance to the Golden Gate Bridge toll plaza. This is of particular concern since the SEIS identifies Doyle Drive and the Golden Gate Bridge toll plaza as the primary entry points for construction vehicles. This information would also be useful to commuters and traffic managers to avoid congestion and sequester heavy truck traffic to minimize pavement wear.

**Response** Providing a master construction schedule in the SEIS would have marginal planning value for commuters or traffic managers because project schedules change so frequently. The Trust is, however, actively coordinating the various construction projects on the Main Post, advising contractors of San Francisco truck restrictions, adapting to the constraints imposed by Doyle Drive reconstruction, and making the public aware of its efforts through signage, advisory notices, and other forms of communication.

Construction guidelines for projects on the Main Post identify the Gorgas Gate and the U.S. Highway 101 northbound slip ramp as the primary construction truck routes through mid-2012, and therefore minimize the contribution of Main Post construction vehicles to the congestion near the Golden Gate Bridge toll plaza. These routes are subject to change due to the Doyle Drive reconstruction project. The ramp from northbound Highway 1 to southbound U.S. Highway 101 is expected to reopen in late 2011, which will ease congestion in the Golden Gate Bridge toll plaza area. In addition to adapting to the constraints of the Doyle Drive project, the Trust will continue to direct construction vehicles to use routes that minimize the impact on surrounding residential neighborhoods.

### **HISTORIC RESOURCES**

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#### **16 The Adverse Effect from Demolition of Building 46 Should be Identified**

On page 131, the resulting adverse effect from the demolition of Building 46 is not disclosed.

**Response** The commentor may have overlooked and is directed to the following disclosure that appears on page 130 in the final SEIS in the discussion of Alternative 1:

*Because Building 46 is a small, ancillary support structure, demolition would not result in a significant impact on the historic Main Post. Demolition of Building 46 would facilitate the rehabilitation of adjacent Buildings 47 and 48 as state-of-the-art laboratory and curation facilities for the archaeology collection, supporting the Trust's efforts to study, preserve, and interpret the Presidio's history. This would have a beneficial impact on the Main Post's historic resources and on the Trust's ability to interpret them for the general public.*

Demolition of the building is discussed again on pages 132 and 133 under Alternative 2:

*In addition, the analysis includes the proposed demolition of a garage (non-historic Building 98), a shed (historic Building 46), Trust headquarters (non-historic Building 34), and Herbst International Exhibition Hall (non-historic Building 385), and the removal of World War II Barracks (Buildings 40 and 41). Of these, Buildings 40, 41, and 46 are contributing structures to the NHLD... Demolition associated with the Archaeology Lab and Curation Facilities under Alternative 2 would be the same as under Alternative 1.*

In both cases, the demolition of Building 46 is necessary for development of the archaeology laboratory and curation facilities.

#### 17 Relocating Buildings 40 and 41 Should Not be Considered a Less-Than-Significant Impact

Moving a building that contributes to the National Historic Landmark (NHL) is an adverse effect, resulting in the resource's loss of integrity.

**Response** The Trust agrees that moving a building that contributes to the NHL would result in the resource's loss of integrity, but this would not be considered a significant impact as defined in the cultural resources analysis. Retention of the physical buildings themselves (via relocation) would still allow the NHL to convey the "central point of the Landmark's significance: the long continuity of military occupation and function, and the breadth and diversity of remaining resources on the reservation, representing a progression of military activities and related construction over the last 200 years."<sup>3</sup> Whereas the complete loss of the buildings would diminish the NHL's inventory of "resources on the reservation," their relocation would adversely affect the individual buildings but retain the resources as part of the NHL. Thus, the Trust is, appropriately, distinguishing between the integrity and significance of the NHL as a whole and its constituent resources. Making this distinction is consistent with the determination of what constitutes a significant impact for the purposes of the cultural resources analysis, which is made explicit on page 129 of the final SEIS: "Adverse effects on individual historic resources (such as buildings or structures) would not be considered significant. Where applicable, the analysis also identifies adverse effects on the NHLD, which would be considered significant." This line of reasoning is

<sup>3</sup> 1993 NHL Update, pages 8-12.

also consistent with the Section 106 Regulations, which point out that a finding of adverse effect on a historic property is not necessarily tantamount to a significant impact under the NEPA.<sup>4</sup>

#### 18 Definitions Should be Provided for the Analysis of Cumulative Impacts on Historic Resources

Definitions are not provided for the impact thresholds. It is unclear what constitutes a less-than-significant, significant, or moderate impact.

**Response** As required by the NEPA, the final PTMP EIS identifies significant impacts. The final SEIS analysis, which tiers from the final PTMP EIS, does not parse further impacts that are less than significant (i.e., moderate impacts). As stated on page 210 in Section 3.12 Cumulative Impacts in the final SEIS, an adverse effect on the NHL as a whole would constitute a significant impact. Also see the above response to Comment 7: More Information on the Magnitude of Impacts Should be Provided.

### ARCHAEOLOGY

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#### 19 Removal of Buildings 40 and 41 Would Not Enhance the Character of the Open Space in the *Plaza de Armas* of El Presidio

Removal of the two structures would not create a sense of place defined by the *plaza de armas* because everything that defines the space is below ground. The open space would instead be larger than current conditions and the vertical edges of the space would be defined by any adjacent buildings, farther away from the *plaza de armas*.

**Response** The U.S. Army initially reused the colonial-era adobe buildings that defined the *plaza de armas*. Subsequent construction that replaced the adobe structures during the U.S. period continued to reflect the geometry of the colonial buildings that framed the *plaza de armas*; today, these include the Funston Avenue Officers' Quarters 11-16 that were built atop the eastern façade of El Presidio and Buildings 42, 45, and 49 built atop the southern façade of El Presidio. Together with the adobe Officers' Club remnant of El Presidio, the *plaza de armas* is currently defined on two of the four sides (the southern and eastern).

Removal of Buildings 40 and 41 would improve internal views toward Pershing Hall, Funston Avenue, and Pershing Square. These views are considered important because prior to the construction of Buildings 40 and 41, these views existed and were character-defining features of El Presidio. The *plaza de armas* was historically an open space surrounded by buildings, and the presence of Buildings 40 and 41 in the middle of this open space cannot help but compromise the ability of a visitor to experience its historic size and shape.

After archaeological excavations have proceeded, landscape interpretations would be implemented to further define the edges, especially the currently undefined western and northern boundaries. At that future point in time, the removal of Buildings 40 and 41 would create a sense of place and allow for the landscape interpretations to be complete by providing uninterrupted views across the historic open space of the *plaza de armas* that fully convey the scale and dimensions of the colonial fortification.

<sup>4</sup> 36 CFR 800.8 *Coordination With the National Environmental Policy Act*.

## 20 Archaeology Plans Should be Finalized Before the Trust Moves Forward with El Presidio Plans

Final archaeology plans should involve scholars with knowledge of Spanish Borderlands culture and history. No permanent demarcation or landscaping of the Spanish Presidio site should precede this effort.

**Response** The Trust agrees and has committed to finalizing *Levantar: An Archaeological Management Plan* for El Presidio as well as standards and guidelines for any archaeology work undertaken at the Main Post before any permanent demarcation. The Presidio Archaeology Lab is continually seeking new partners to collaborate in the endeavor to better understand, preserve, and interpret El Presidio. This includes scholars in the Spanish Borderlands, descendant and heritage organizations, and interested students.

## VISUAL RESOURCES

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### 21 The Analysis of the Visual Impact of the Office Building Under Alternative 1 Should be Completed

The analysis acknowledges that the office building would block the view to the Bay from El Presidio, but then states that this is not an adverse effect because the overall panoramic view would not be blocked. This inconsistency should be resolved and the impact reevaluated.

**Response** There is neither an inconsistency nor a need for reappraisal. The visual analysis on page 165 of the final SEIS states:

*Figure 25 shows that the office building would be visible from the Officers' Club and that its southernmost portion would block a small portion of the bay view. However, its impacts on the overall panoramic view would not be extensive enough to create an adverse impact. The building would not affect the linear view south down Graham Street from the Officers' Club or views to the Main Post from Crissy Field or from the bay.*

The analysis concluded that the overall view from the Officer's Club would be retained, although a "small portion" would be blocked due to the height of the new office building. The Trust maintains that, because the overall view would be retained, the office building would not have a significant impact on historic views on the Main Post. In response to the comment, Mitigation Measure VR-2 *Height Limits on New Construction* has been broadened by removing references to specific buildings so that the measure now prescribes height limits within design guidelines for any new construction that has the potential to block internal Main Post views. See errata in Attachment C.

### 22 The Analysis of the Visual Impact of the Presidio Theatre Addition Should be Reconsidered

The analysis states that construction of the theater addition would add to the variety of buildings and styles within the district and not create a negative impact. This variety is an important factor within the context of military history, but this is not the case for new construction. It is not clear how adding a new building or a new style would negate a visual impact.

**Response** New construction would be directed by guidelines and treatment recommendations that would ensure compatibility with the historic theater and its surrounding landscape, thus avoiding an impact on the visual character of the area. In response to the comment and to improve the visual analysis, a statement to this effect has been added to the final SEIS text, and the sentence that the commentor objects

to has been deleted. See errata in Attachment C. The text revisions do not, however, change the determination that the location of the theater addition and its relationship to historic buildings and landscapes would not have a significant impact on important views in the Main Post.

### 23 The Analysis of the Visual Impact of the Presidio Chapel Addition Should be Reconsidered

The analysis states that the addition would have minimal impacts on the chapel's immediate surroundings. The addition would engulf approximately two-thirds of the west elevation and would change the building form, which would have a negative impact on this side of the building and adjacent landscape.

**Response** The commentor's assertion that the chapel addition would "engulf" the building's west elevation is an overstatement. While approximately 50 percent of the west elevation would be covered by the new addition, the height of the new addition would be kept below the level of the four arched windows, and the entire eave/cornice line of the west elevation would remain intact. Therefore, the west elevation's character-defining features would be retained and visible. In response to the comment and to improve the clarity of the visual analysis, the text in the final SEIS has been changed. See errata in Attachment C.

The location for the chapel addition was identified through the Section 106 consultation to ensure that the visual impact on the most historically sensitive elements of the building (the east and north facades) and the landscape (also east and north) would be minimized. Design guidelines would further serve to reduce the impact to the building's visual setting as a whole.

### 24 The Analysis of the Impacts on Views of the Parade Grounds Should be Reconsidered

The analysis states that Alternative 2 would maintain internal views between the Old Parade and the Main Parade that would be blocked in Alternative 1. However, the photosimulations do not support this conclusion; rather, views would be lost under Alternative 2.

**Response** The visual analysis on page 174 of the final SEIS states:

*The lodge would affect some short-range, east-west internal views at the Main Post. However, because the lodge would consist of a number of separate buildings with open space between them, Alternative 2 would maintain internal views between the Old Parade and the Main Parade that would be blocked in Alternative 1. The lodge would block the view of some Montgomery Street Barracks from a street-level vantage point near Building 39 because the area south of Owen Street is currently an open lawn.*

In Alternative 1, Building 34 would remain and a new office building consisting of two linked structures would be located south of it (as shown in Figure 2 on page 19 of the final SEIS). This arrangement would allow for three short-range, east-west views between the structures. In Alternative 2, Building 34 would be demolished and replaced with five linked structures located south of Buildings 86 and 87 (as shown in Figure 4 on page 23 of the final SEIS). This arrangement would allow for four short-range, east-west views between the building volumes. Because Alternative 2 would offer one more short-range, east-west view than Alternative 1, the visual analysis notes the difference. However, the analysis also acknowledges that portions of the short-range, east-west internal views from Building 39 would be lost due to the new lodge construction. The visual analysis (pages 170 and 174 of the final SEIS) concludes that the "lodge

buildings would create a spatial separation between the Main Parade and the Old Parade and would provide a built edge to both parade grounds, helping to visually define the boundaries of the two open spaces” and that “unlike the office building at the site in Alternative 1, the lodge would be roughly based on the historic barracks layout and provide a strong visual unity with Buildings 86 and 87.” Nonetheless, despite their limited interruption of some short-range, east-west internal views within the district, both the office and the lodge buildings would improve the visual setting of the Main Post.

## RECREATION

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### 25 The Loss of Bowling Should be Discussed in the Cumulative Impact Analysis

More recent visitation information and more information on this user group should be provided. The nation-wide decrease in bowling is cited as justification for eliminating bowling without adequate consideration of local conditions or demands. As discussed, the elimination of bowling at the Presidio would result in only 12 lanes in San Francisco.

**Response** According to the proprietor of the Presidio Bowling Center, visitation at the Presidio Bowl has remained steady in recent years, averaging between 90,000 and 100,000 visits annually. Determining the demographic and socioeconomic/lifestyle characteristics of Presidio Bowling Center visitors is beyond the scope of the SEIS. However, based on visitor and sales figures information provided by the bowling center, in 2010, approximately 83 percent of the facility users were bowlers, and the remaining 17 percent were social visitors (spectators, diners, internet and arcade games users, etc.). League bowlers represented approximately 11 percent of all games, a decline from the historical average of 18 to 20 percent. Approximately 76 percent of the casual bowlers were between the ages 18 and 59; the other 24 percent were under the age of 18 or over 60. The bowling center also appeals to families with children; in 2010, 2,732 children attended 245 birthday parties.

The discussion of the steady reduction in the number of bowling centers nationally was provided in the final SEIS not to justify the potential loss of the Presidio Bowling Center but rather to provide a background context for its closure. The NEPA requires federal agencies to document socioeconomic changes and trends and their underlying causes that bear on a proposed project, and the PTMP specifically directs the Trust to “monitor changing patterns of use and trends in recreational activities” (Recreational Facilities, page 25). As noted on page 193 of the final SEIS, the closure of the bowling center would leave only 12 lanes (at the Yerba Buena Ice Skating and Bowling Center) available to bowlers in San Francisco. While some might travel to this or one of the other facilities throughout the greater San Francisco Bay Area,<sup>5</sup> research suggests and the Presidio Bowling Center proprietor concurs that most bowlers would likely forfeit the sport and pursue other recreational interests. Information in U.S. Bowler magazine<sup>6</sup>

<sup>5</sup> Including bowling centers in South San Francisco (Brentwood Bowl), Pacifica (Sea Bowl), Daly City (Classic Bowling Center and Serra Bowl), Redwood City (AMF Redwood Lanes), San Mateo (AMF Bowling Center and Bel Mateo Bowl), Albany (Albany Bowl), San Jose (the 300), Fremont (Cloverleaf Family Bowl), Dublin (Earl Anthony’s), Cupertino (Bowlmor Lanes), and Alameda, Pinole, and San Rafael (AMF Bowling Centers).

<sup>6</sup> Sourced from a 2006 Erdos & Morgan Subscriber Study.

indicates that bowlers participate in many activities in addition to bowling, including swimming (35 percent), golf (31 percent), bicycling (19 percent), strength training (19 percent), running/jogging (12 percent), and other sports activities (96 percent), such as rock climbing, trampoline jumping, fitness classes, and more. All of these activities are readily available within the Presidio. All the same, the closure of the Presidio Bowling Center would follow national trends and would displace current users. The text in Section 3.12 of the final SEIS has been amended to reflect this cumulative impact. See errata in Attachment C.

## WATER RESOURCES

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### 26 More Information on the Existing Wetland Near the Proposed Athletic Field Should be Provided

The location and extent of the wetland feature should be shown so that any impacts from the proposed athletic field can be adequately analyzed.

**Response** See the above response to Comment 3: The Need for a New Athletic Field Should be Stated in the Purpose and Need.

### 27 Proposed Stormwater Best Management Practices (BMPs) Should be Discussed with the NPS

Much of the stormwater from the project area drains to Crissy Marsh. The Trust should discuss with the NPS the proposed BMPs to protect and improve the water quality in the marsh. The marsh should also be protected from hazardous spills in Area B.

**Response** As stipulated in the PTMP and required by the NEPA, the Trust will continue to give notice to, consult with, and consider NPS comments on Trust projects that include infrastructure changes and any associated BMPs that may have potential effects on Area A of the Presidio, which is under NPS jurisdiction. Depending on the type of hazardous spill, Trust staff, contractors, and other responders would employ procedures and tactics outlined in the Trust's draft Spill Prevention, Control, and Countermeasure (SPCC) Plan, the Stormwater Management Plan, or project-specific Stormwater Control Plans to address impacts that may result from a discharge from Area B.

## AGENCY CONSULTATION

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### 28 The Trust Should Only Proceed with the Heritage Center, Interpretive Signage, and Interpretive Programming in Area B Following Consultation with and the Approval of the NPS

The Heritage Center and interpretive signage appear to be planned, developed, and presented by the Trust alone. The NPS is responsible for interpretive programs and museums in all federal historic sites and national parks. The Presidio should be no exception.

**Response** The Trust Act states:

*The Secretary shall be responsible, in cooperation with the Presidio Trust, for providing public interpretive services, visitor orientation and educational programs on all lands within the Presidio.*

The Trust Act gives jurisdiction over Area B of the Presidio to the Presidio Trust. While it confers responsibility on the NPS to provide interpretive services, visitor orientation, and educational programs, it

requires the NPS to cooperate with the Trust in these activities, recognizing the Trust's jurisdiction in Area B.

The Trust Act does not prohibit the Trust from providing interpretive, educational, and orientation services. The Trust does collaborate with the NPS, the Golden Gate National Parks Conservancy, and others to provide these services. The Trust, the NPS, and the Golden Gate National Parks Conservancy are working together to plan, develop and operate a Visitor Center. The Trust is committed to ensuring that these visitor services are provided and that they meet the highest standard. The Trust appreciates the participation of the NPS, the Golden Gate National Parks Conservancy, and other partners in this effort.

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# Attachment C Errata

This attachment provides text corrections that have been incorporated by reference into the Main Post Update and accompanying final SEIS as specified below. Changes include the correction of typographical, mathematical, or other errors discovered following release of the Main Post Update and final SEIS, and/or clarifications provided in response to public comment as summarized in Attachment B. These changes do not substantively alter the conclusions of the SEIS or otherwise influence the basis upon which the Trust has made its decision regarding the project.

Changes are generally presented using verbatim quotes from the relevant document and **bold face/strikeout**, unless otherwise noted. Section and page numbers are provided as a guide for the reader.

## MAIN POST UPDATE

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On page 23, under Key Projects and Improvements for the Main Post, revise the ninth bullet as follows:

- *Ensure that new construction ~~for the Presidio Lodge, the Presidio Theatre addition, and the addition to the Presidio Chapel~~ is sited and configured to be compatible with the historic district.*

On page 27, under Creating a Welcoming Place, revise the first half of the second sentence of the second bullet as follows:

- *Ensure ~~that new public uses on~~ access to the ground floors ~~spill out onto~~ **and** the porches facing the Main Parade...*

## FINAL SEIS

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### 1 Purpose and Need

On page 2, under Statement of Purpose and Need, revise the fourth, fifth, and ninth bullets and add a new bullet after the fourth bullet as follows:

- *Retain the Officers' Club as a venue for meetings, cultural events, and community activities, ~~and establish a Heritage Center in a portion of the building.~~*
- ***Establish a Heritage Center at the Main Post.***
- *Establish an Archaeology Center with a lab and curation facilities ~~in Buildings 44, 47, 48, and 49.~~*
- *Ensure that new construction ~~for the Presidio Lodge, the Presidio Theatre addition, and the addition to the Presidio Chapel~~ is sited and configured to be compatible with the historic district.*

On page 4, under Strategies, add the following text after the last full sentence on the bottom of the page:

***A new athletic field would allow opportunities for active recreation, both for the Presidio's growing community and for the general public. This is especially important given the constraints surrounding other areas of the park and the removal or relocation of existing fields for the Tennessee Hollow restoration.***

3.3 Transportation and Parking

On page 81, under Parking Impacts, revise the second paragraph as follows:

*Table 17 presents a summary of the weekday parking demand, as compared to supply, for each alternative. To provide an estimated range of TDM effectiveness, **Alternative 2 all alternatives** reflects a 10-percent reduction in demand associated with implementation of parking fees and restrictions, ~~and Alternative 3 reflects a more modest 5 percent reduction in demand.~~*

On page 81, under Parking Impacts, revise the fifth paragraph as follows:

*Alternative 1 Without any underground parking, and without the demolition of Building 385, this alternative would provide 1,817 parking spaces and is estimated to have a demand for ~~2,098~~ **1,888** spaces, resulting in a ~~281 71-space~~ **(13 4-percent)** deficit. The lack of an access ramp to underground parking at the north bluff would allow approximately 25 more surface spaces. This alternative reflects ~~a moderate degree of TDM measures~~ **and that** would ~~not substantially~~ increase auto occupancy ~~or~~ **and** reduce auto mode share beyond the level anticipated in the final PTMP EIS. ~~Without more aggressive TDM strategies, finding parking in the Main Post would be difficult, and motorists may go to Crissy Field to find parking.~~*

On page 83, under Parking Impacts, revise Table 17 as follows:

**17 COMPARISON OF MAIN POST WEEKDAY PARKING DEMAND AND SUPPLY BY ALTERNATIVE**

	Number of Parking Spaces			
	Alternative 1	Alternative 2	Alternative 3	Alternative 4
<i>Estimated Demand</i>	2,098	2,102	1,973	1,963
<i>TDM Adjustment</i>	<del>– (210)</del>	(210)	<del>(99 197)</del>	<del>– (196)</del>
<i>Adjusted Demand</i>	<del>2,098</del> <b>1,888</b>	1,892	<del>1,874</del> <b>1,776</b>	<del>1,963</del> <b>1,767</b>
<i>Supply</i>	1,817	1,910	1,892	1,852
<i>SURPLUS/DEFICIT</i>	<del>(-281 71)</del>	<b>18</b>	<del>18 116</del>	<del>(-111 85)</del>

On page 83, under Parking Impacts, revise the first and second full paragraphs as follows:

*Alternative 3 Under this alternative, there would be no parking within El Presidio. Demand would be about ~~11 6~~ percent less than under Alternative 1, but the number of surface spaces would be 20 percent less than under Alternative 1. A combination of a ~~modest~~ **(5 10-percent)** TDM reduction in demand and 435 underground parking spaces would allow supply to accommodate estimated demand with a ~~negligible~~ surplus of spaces.*

*Alternative 4 Approximately 250 spaces would remain at the site of El Presidio under this alternative. In total, about 1,852 parking spaces would be provided. There would be no underground parking at the north bluff, and the lack of an access ramp to underground parking would allow approximately 25 more surface spaces at the north bluff. This alternative is estimated to generate a parking demand for about ~~1,963~~ **1,767** parking spaces, resulting in a ~~deficit~~ **surplus** of an estimated ~~111 85~~ spaces.*

### 3.8 Visual Resources

On page 165, under Presidio Theatre, delete the last sentence of the first paragraph and replace with the following:

*~~New construction would add to the extensive variety of architectural styles, building sizes, and construction types found within the district and would not create a negative impact on the visual character.~~ New construction would be directed by guidelines and treatment recommendations that would ensure compatibility with the historic theater and its surrounding landscape, thus avoiding an impact on the visual character of the area.*

On page 170, under Presidio Chapel, revise the second sentence to read as follows:

*Because it would be located on the west side ~~of and set back from~~ rear of the existing building, the addition would ~~have minimal visual impacts on~~ affect only a portion of the chapel's immediate surroundings.*

On page 182, under Mitigation Measures, revise the mitigation measure to read as follows:

*VR-2 Height Limits on New Construction (new) To avoid ~~having the History Center (Alternative 3) blocking of~~ internal Main Post views, Design Guidelines will establish height limits on new construction.*

### 3.12 Cumulative Impacts

On page 215, under Historic Resources, add the following text to the last sentence in the first full paragraph:

*Although certain "aspects of integrity" would be diminished, the vast majority of individual historic properties would endure as contributing resources **and the cumulative impacts would be less than significant.***

On page 220, under Recreation, add a new paragraph following the first paragraph:

*The closure of the Presidio Bowling Center under Alternatives 2 and 3 would follow national trends. Its closure would have an adverse effect on current users, whose needs would have to be met through other bowling facilities within driving distance outside the Presidio boundaries, or through other recreational activities widely available in and near the park.*

### 3.13 Other Impacts

On page 227, under Biological Resources, revise the fifth sentence as follows:

*The impacts of light pollution, including harm to nocturnal wildlife and ecosystems, would be minimized through ~~high-quality outdoor lighting and minimal impact lighting techniques~~ careful design of all lighting to avoid glare, light trespass, or contribution to sky-glow.*

On page 231, under Non-Significant Impacts, add a new section and a new Table 29 as follows:

#### *Park Management and Operations*

*The decrease in building space and changes in building uses contemplated under the mitigated preferred alternative would not materially affect the park's long-term financial future and therefore would have no adverse impacts on park management and operations. Building-related capital projects (including demolition) needed to build out the Main Post Update would be approximately \$216.1 million, compared to \$245.1 million to build out the Main Post under the PTMP (see Table 29). The decrease in building-related capital costs of \$29.0 million would be due mainly to reduced building space under the Main Post Update. The \$29.0-million decrease would reduce park-wide costs (estimated at \$700.0 million under the PTMP) by 4.1 percent. The proposed*

*reduction in office and residential square footage and increase in square footage allocated to cultural, educational, and public-serving uses under the Main Post Update would potentially decrease revenues by \$2.3 million annually. This decrease would represent 2.6 percent of the estimated \$87.2 million in park-wide revenue in 2030. This is considered a modest loss, and well within the margin for error for the purposes of this type of financial analysis, taking into account financial uncertainties and changing market conditions. Thus, the decrease in building space and changes in building uses contemplated under the Main Post Update would not affect the park's long-term financial future.*

## 29 SUMMARY OF MAIN POST CAPITAL COSTS AND REVENUES

	<i>Main Post</i>			<i>Park-Wide (2030)</i>	<i>Main Post Change as Percent of Park-Wide Total</i>
	<i>2002 PTMP</i>	<i>2010 Update</i>	<i>Change</i>		
<b>BUILDING-RELATED CAPITAL COSTS<sup>a</sup></b>					
Office Uses	130.5	79.1	(51.4)	-	-
Public-Serving Uses	62.8	95.2	32.3	-	-
Residential Uses	50.5	36.1	(14.4)	-	-
Demolition	1.2	5.6	4.4	-	-
<b>Total</b>	<b>245.1</b>	<b>216.1</b>	<b>(29.0)</b>	<b>700.0</b>	<b>(4.1%)</b>
<b>ANNUAL RESIDENTIAL AND COMMERCIAL BUILDING REVENUES<sup>a</sup></b>					
Office Uses	10.6	6.6	(4.0)	-	-
Public-Serving Uses	5.4	8.4	3.0	-	-
Residential Uses	4.9	3.5	(1.4)	-	-
<b>Total</b>	<b>20.9</b>	<b>18.6</b>	<b>(2.3)</b>	<b>87.2</b>	<b>(2.6%)</b>

<sup>a</sup> Dollars noted in millions (constant Fiscal Year 2011 dollars).

Notes: Figures may not add due to rounding. See Tables 2, 3, and 4 on pages 18 and 19 of the Main Post Update for square footage estimates used to prepare the updated financial analysis.